

Compliance Assessment Report CAR_NRW0037431

Permit being assessed: RP3195FP.

For: Cwmbran Service Centre, held by Rentokil Initial UK Ltd

At: Cwmbran Service Centre, Unit 334, Woodside Way, Springvale Industrial Estate, Cwmbran, Torfaen, NP44 5BR.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 29/01/2021.

Parts of permit assessed: 2.2.1

NRW Lead Officer: Jak Rose.

Report sent to: Lorraine Carter , Branch Manager on 29/01/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This is a desk-based audit of the 2020 Waste Return submissions for Rentokil Initial Services Ltd located at Unit 334, Woodside Ways, Springvale Industrial Estate, Cwmbran, Gwent, NP44 5BR permit number EPR- RP3195FP conducted by Officer Jak Rose on 29 January 2021.

To remind the operator, following each assessment Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the audit. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions. This can affect your site banding and annual subsistence fees; scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 - Significant impact on effect on the environment/people/property
- 3 - Minor impact or effect on the environment/people/property
- 4 - A non-compliance which has no potential environmental effect

PERMIT COMPLIANCE

No breaches identified during the desk-based audit. Correct EWC codes used and within annual throughput. The Operator has submitted the quarterly returns within one month of the end of each quarter/the year, the Operator has submitted the data made available relating to the site and the waste accepted and removed from it during the previous quarter.

WASTE RETURNS OBSERVATIONS

- The site is permitted to accept a total annual through put of 5,000 tonnes per annum. The site has declared that it accepted approximately 822.288 tonnes through the 2020 period; this is within the allowance.

Quarter 1

- The site submitted its 2020 Quarter 1 spreadsheet on 20 April 2020 declaring that 228.961 tonnes were accepted, and 228.961 tonnes were removed.
- In 2020, Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this was correctly filled out by the operator.
- Wastes are being correctly coded under the disposal and recovery codes:
 - D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13 Temporary storage of wastes pending any other recovery operation (excluding temporary storage, pending collection, on the site where it is produced).
- Wastes are collected from all over the South Wales region and the wider regions of Wales
- The waste is then removed to facilities in Wales and England for recovery or disposal.
- For waste received and removed the Local authority areas are preferred in which case please put the relevant area the waste has come from.

Quarter 2

- The site submitted its 2020 Quarter 2 spreadsheet on 16 July 2020 declaring that 117.835 tonnes were accepted, and 117.835 tonnes were removed.
- In 2020, Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this was correctly filled out by the operator.
- Wastes are being correctly coded under the disposal and recovery codes:
 - D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13 Temporary storage of wastes pending any other recovery operation (excluding temporary storage, pending collection, on the site where it is produced).
- Wastes are collected from all over the South Wales region and the wider regions of Wales
- The waste is then removed to facilities in Wales and England for recovery or disposal.
- For waste received and removed the Local authority areas are preferred in which case please input the relevant area.

Quarter 3

- The site submitted its 2020 Quarter 3 spreadsheet on 23 October 2020 declaring that 217.572 tonnes were accepted, and 217.572 tonnes were removed
- In 2020, Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this has expired in September 2020.
- Wastes are being correctly coded under the disposal and recovery codes:
 - D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13 Temporary storage of wastes pending any other recovery operation (excluding temporary storage, pending collection, on the site where it is produced)
- Wastes are collected from all over the South Wales region and the wider regions of Wales
- The waste is then removed to facilities in Wales and England for recovery or disposal.
- For waste received and removed the Local authority areas are preferred in which case please input the relevant area.

Quarter 4

- The site submitted its 2020 Quarter 4 spreadsheet on 25 January 2021 declaring that 257.92 tonnes were accepted, and 257.92 tonnes were removed

- In 2020, Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this has expired in September 2020.
- Wastes are being correctly coded under the disposal and recovery codes:
 - D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - R13 Temporary storage of wastes pending any other recovery operation (excluding temporary storage, pending collection, on the site where it is produced).
- Wastes are collected from all over the South Wales region and the wider regions of Wales
- The waste is then removed to facilities in Wales and England for recovery or disposal.

If you have any issues with this report, please contact Officer Jak Rose on jak.rose@naturalresourceswales.gov.uk

We look forward to working with the site in 2021.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales Establishment) Order 2012

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.