

Compliance Assessment Report CAR_NRW0037485

Permit being assessed: EP3994LG.

For: The Granary, held by Caerphilly Skip Hire (C W S) Ltd

At: Graddfa Road, Llanbradach, Mid Glamorgan, CF83 3QS.

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

On 04/02/2021.

Parts of permit assessed: Waste Returns

NRW Lead Officer: Jonathan Lee.

Report sent to: Alun Pitten, Michael Jones, TCM/Directors on 04/02/2021.

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	Action only (X)	

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?

Criteria	Action needed	Complete by
G4	Ensure future waste returns are completed accurately.	05/02/2021

Action criteria codes are listed in the 'Important information' section below.

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

Compliance Assessment Report – Caerphilly Skip Hire (CWS) Limited

This is a desk-based audit of the 2020 Waste Return submissions for Caerphilly Skip Hire Limited,

Graddfa Industrial Estate, Llanbrdach permit number EPR-EP3994LG conducted by Officer Jonathan LEE.

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

G4 – Reporting and notification to Natural Resources Wales – Action only

Permit condition 4.2.2 states that *‘within one month of end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.’*

It is essential to submit your Returns data to NRW on-time to allow us to assess your waste inputs and outputs, even if for a null-return. Operators have a one-month grace period to submit returns:

QUARTER	PERIOD	DEADLINE
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

As specified in detail below, there are some **minor** administrative errors within waste return submissions for 2020. The waste returns do not require re-submission but errors should be corrected in all future returns.

Action only – Ensure future waste returns are completed accurately. Deadline is on receipt of report.

More information on Waste Returns can be found on our website:

<https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/new-wales-operator-waste-return-and-deadlines-for-returns/?lang=en>

Waste Returns Observations

- The site is permitted to accept a total annual throughput of 74,999 tonnes. The site has declared that it accepted approximately 23,709 tonnes through the 2020 period; this is within the permitted allowance.

Quarter 1

- The operator submitted its 2020 Quarter 1 spreadsheet on 3rd April 2020 declaring that 5236.9 tonnes were accepted, and 5350.14 tonnes were removed.
- Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this was correctly filled out by the operator.
- All waste accepted was listed as **EWC 200301**.
- Waste removed were listed as the separated fractions of the waste transfer station operations.
- Large portions of removed waste listed as **EWC 191212** sent to Local Authorities destinations of Merthyr Tydfil and Swansea.
- Large portion of removed waste listed as **EWC 170504** sent to Local Authority of Merthyr Tydfil.
- No unauthorised waste streams accepted to the site.

Quarter 2

- The operator submitted its 2020 Quarter 2 spreadsheet on the 10th August 2020. The date listed on the return spreadsheet was the 3rd April 2020, this is understood to be an administrative error as same as Q1 return date. The return declared that 5550.8 tonnes were accepted, and 5621.2.14 tonnes were removed.
- Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this was correctly filled out by the operator.
- All waste accepted was listed as **EWC 200301**.
- Waste removed were listed as the separated fractions of the waste transfer station operations.
- Large portions of removed waste listed as **EWC 191212** sent to Local Authorities destinations of Merthyr Tydfil and Swansea.
- Large portion of removed waste listed as **EWC 170504** sent to Local Authority of Merthyr Tydfil.
- No unauthorised waste streams accepted to the site

Quarter 3

- The operator submitted its 2020 Quarter 3 spreadsheet on the 29th October 2020. The date listed on the return spreadsheet was the 3rd April 2020, this is understood to be an administrative error as same as Q1 return date. The return declared that 7170 tonnes were accepted, and 7037.85 tonnes were removed.
- Technically Competent Manger (TCM) details were required to be populated on the Waste Return documents - this was correctly filled out by the operator.
- All waste accepted was listed as **EWC 200301**.
- Waste removed were listed as the separated fractions of the waste transfer station operations.
- Large portions of removed waste listed as **EWC 191212** sent to Local Authorities destinations of Merthyr Tydfil and Swansea.

- Large portion of removed waste listed as **EWC 170504** sent to Local Authority of Merthyr Tydfil.
- No unauthorised waste streams accepted to the site

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Quarter 4

- The operator submitted its 2020 Quarter 4 spreadsheet on the 12th January 2021. The return declared that 5753 tonnes were accepted, and 5694.28 tonnes were removed.
- Technically Competent Manager (TCM) details were required to be populated on the Waste Return documents - details declared that the TCM continuing competency certificate expired on the 8th November 2020. Please ensure this is updated in future waste returns.
- All waste accepted was listed as **EWC 200301**.
- Waste removed were listed as the separated fractions of the waste transfer station operations.
- Large portions of removed waste listed as **EWC 191212** sent to Local Authorities destinations of Merthyr Tydfil and Swansea.
- Large portion of removed waste listed as **EWC 170504** sent to Local Authority of Merthyr Tydfil.
- No unauthorised waste streams accepted to the site.

It was noted in all quarters that the Disposal or Recovery Code in the 'Waste_Removed' tab for 19 12 12 removed to Merthyr Tydfil is listed as 'R.03.07 Recycling'. This waste is understood to be waste fines sent to landfill. Please ensure that the correct Disposal Code is used for this waste. For example, **D.05.02 Non-hazardous waste landfill**.

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If you have any issues with this report, please contact Officer Jonathan LEE on 0300 065 3908 or via email at jonathan.lee@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.