

Compliance Assessment Report CAR_NRW0037494

Permit being assessed: EP3795FQ.

For: Penallta Civic Amenity Site, held by Caerphilly County Borough Council

At: Penallta Civic Amenity Site, Penallta Industrial Estate, South Road, Hengoed, Caerphilly, CF82 7ST.

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

On 04/02/2021 between 11:15 and 11:30.

Parts of permit assessed: A / B / C / D / F / G

NRW Lead Officer: Greg Gardner, accompanied by Alex Bowder.

Report sent to: Scott Jones, Technically Competent Manager on 19/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B2 - Infrastructure - Closure and decommissioning	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	Assessed (A)	
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?

Criteria	Action needed	Complete by
B4	Ensure IBC's on site have no potential loss of containments of hazardous liquids	01/03/2021

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

This report details the site visit made on the 4th February 2021 to Penallta HWRC (Household Waste Recycling Centre), Permit number EPR-EP3795FQ

Officers Alex BOWDER and Greg GARDNER attended the Penallta HWRC site at Penallta Industrial Estate, South Road, Hengoed, CF82 7ST for a routine site inspection at 11:15am where we met with Mr. Robert WAKELY (Technically Competent Manager). The weather was wet and cold all through the site visit.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and

annual subsistence fees; this is 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 HISTORY

See below extract from permit regarding variation history.

Status log of the permit		
Description	Date	Comments
Permit determined EAWML 30346	09/11/04	Original permit issued to Verdant Group PLC.
Transfer determined EAWML 30346	05/07/05	Permit transferred in full to Biffa Waste Services Limited.
Transfer determined EAWML 30346	10/12/07	Permit transferred in full to Caerphilly County Borough Council.
Application EPR/EP3795FQ/V002 (formerly EAWML 30346)	Duly made 06/03/14	Application for administrative variation to add waste codes to the permit.
Variation determined EPR/EP3795FQ	06/06/14	Varied permit with additional waste codes issued.

GENERAL OBSERVATIONS

Penaltta HWRC operate under a bespoke environmental permit based on standard rule set SR2010_No13. This site is used as a household waste transfer station with the waste being distributed to other companies / sites within the UK. The site was in operation at the time of the visit with numerous vehicles attending the HWRC. No waste of any type was stored outside of the permit boundary at the time of the visit.,

WASTE ACTIVITIES - GENERAL

The site had numerous skip containers (as seen in photo 1) which were all clearly identified with the correct labelling waste type to determine which waste would be placed in the correct skip container without confusion. There were also 3 employees on site directing traffic and informing members of the public the correct skip containers to use to segregate the waste correctly. This was witnessed by NRW officers at the time of the inspection.



Photo 1 - Various skip containers housing segregated waste

The site was in good condition with no issues with the interceptor drainage system, which was fully operational at the time of the inspection. The general housekeeping of the site was kept to a good standard with very little debris located on the floor and designated zones set up for the various waste streams. The site was abiding by current COVID-19 restrictions by only allowing a small number of vehicles access to the site to drop off waste at any one time. The flooring condition on site is in good order with no cause for concern (as seen in photo 2).



Photo 2 - Flooring condition along with segregated skips along with good housekeeping standards

WASTE ACTIVITIES - HAZARDOUS

It was noticed by NRW officers that a small green container contained a hazardous waste symbol (as seen in photo 3) which the site manager identified to NRW officers that it contained fluorescent tube lighting. This small green container was correctly sealed and stored and caused no concern at the time of the site inspection. This type of hazardous waste is permitted for this site under EWC (European Waste Classification) **20 01 21*** fluorescent tubes and other mercury-containing waste.



Photo 3 - Small green container, sealed and stored correctly containing fluorescent tube lighting

During the site inspection, a sealed skip containing asbestos materials was identified (as seen in photo 4). The integrity of the skip was in good condition with no apparent damaged areas where a possible loss of containment could occur and was situated on site in a designated / quarantined zone away from persons. The site manager informed NRW officers that the asbestos must be double wrapped (to prevent loose fibres) before it is accepted on to site. There was no issue with this container during the site inspection.



Photo 4 - Sealed skip containing asbestos waste

Prior to leaving the site it was noted by NRW officers of a potential leak / loss of containment from a IBC (Intermediate Bulk Container) due to a small amount of blue liquid emanating from the tap point on the IBC (as seen in photo 5). This IBC contained hazardous liquids such as paints and chemicals. The liquid was draining to the on site interceptor drainage system, which was fully operational and no cause for concern at the time of the site inspection. It was noted, as a quick countermeasure, that adding absorbent pads / sawdust to the affected area would help alleviate the issue with a new IBC / secured tap a longer term solution.



Photo 5 - IBC with blue liquid leaking from tap point

ACTION: Ensure loss of containment from IBC's is prevented with the appropriate countermeasures in place

WASTE RETURN SUBMISSIONS

The total quantity of waste accepted at this site must not exceed 25,000 tonnes per year. Based on the submitted waste return data for 2020, the total was accepted was 2,880.09 tonnes which is within the sites annual threshold.

NRW officers Alex BOWDER and Greg GARDNER left site at 11:30am.

I look forward to working with the site in future.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

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.