

Compliance Assessment Report CAR_NRW0037832

Permit being assessed: FP3695LM.

For: D B C Recycling Facility, held by D B C Site Services 2005 Ltd

At: Players Industrial Estate, Clydach, Swansea, West Glamorgan, SA6 5EJ.

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

On 31/03/2021 between 10:05 and 11:05.

Parts of permit assessed: A, B, D, G

NRW Lead Officer: David Morgan.

Report sent to: Dennis Connor, Director on 06/04/2021.

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	C4 No impact	4.2.2

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

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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	You must submit outstanding Waste Returns	21/04/2021

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

A routine site inspection was undertaken on Wednesday 31st March 2021.

Present on site at the time of the inspection were David Morgan (Natural Resources Wales) and Dennis Connor (DBC Site Services). Following an on-site discussion with the operator, it was noted that the site had temporarily closed last year due to issues associated with Covid-19 (travel restrictions etc.).

The following observations were made during the inspection:

Infrastructure

In previous inspections (most recently on 13th March 2019), Natural Resources Wales officers have recorded a non-compliance with infrastructure requirements. The conditions of the Environmental Permit state that all wastes must be treated on an impermeable surface.

At the time of the inspection, the site was undergoing significant infrastructure works, and it appeared that the site is being re-surfaced. As a result of this work, some waste (depolluted vehicles) was being stored at heights above normal working practices. It was noted that this is a temporary measure.

There was some minor pooling of surface waters on site, and some areas of the site surface appeared damaged. However, as infrastructure works were ongoing at the time of the inspection, further inspection of these areas would be more appropriate at a later date.

Site Drainage & Monitoring

It is noted that partial areas of the site drain via an interceptor and then to soakaway. At the time of the inspection, due to ongoing infrastructure works, the interceptor discharge chamber (interceptor to soakaway) was inaccessible. It is likely, that in the next inspection, Natural Resources Wales officers will request access to this chamber. Please ensure efforts are made to keep this area accessible.

The Environment Management System ('2.4.2.1 - Site Drainage & Monitoring Plan') for the site states that monitoring is undertaken to assess the impact operations are having on land and groundwater.

At the time of the inspection, this information was unavailable, as the member of staff responsible for managing this information was not present. A request was made that monitoring information be provided to Natural Resources Wales.

Reporting & Records Management

Natural Resources Wales' records indicate that Waste Returns information has not been provided since 2015. This is a breach of the Environmental Permit. You must supply information of waste accepted and removed from site.

While on site, it was noted that comprehensive records of waste inputs/outputs are being kept. Please ensure that Waste Returns for 2016 - 2021 (Q1) are sent to Natural Resources Wales.

Condition 4.2.2 of the Environmental Permit was breached (Category 4 - No Impact) (Ref:G4)

Please ensure all missing Waste Returns information is provided to Natural Resources Wales by Wednesday 21st April 2021.

Information and advice regarding Waste Returns can be found on our website using the following link: <https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/submit-your-waste-return/?lang=en>

Summary

At the time of the inspection, the site was undergoing significant infrastructure works. It is likely, that in the next inspection, officers will inspect the works, specifically the resurfacing works.

The drainage chambers were inaccessible at the time of the inspection. Please ensure these areas are kept free.

Please provide monitoring information from various drainage chambers and boreholes that shows the impact operations are having on land and groundwater.

Thank you for your time during the inspection.

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.