

This form will report compliance with your permit as determined by an NRW officer

Site	Dowlais C/a Site	Permit Ref	ZB3797TH
Operator/Permit holder	Sundorne Products (Ilanidloes) Ltd		
Regime	Waste Operations		
Date of assessment	03/07/2018	Time in	12:00
Assessment type	Site Inspection	Out	12:45
Parts of the permit assessed	Assessed part of permit		
Lead officer's name	Coleman, Craig		
Accompanied by			
Recipient's name/position	Mark Phillips/ Technically Competent Manager	Date issued	10/07/2018

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Dowlais Site Visit – Dowlais HWRC, Merthyr Tydfil (EPR/ ZB3797TH) – 03/07/2018

Environment officer Craig Coleman attended Potters facility at Aberfan, Merthyr Tydfil on 03/07/2018 to meet with Mark Phillips (Potters), Stephen Thomas and Christian Jones (MTCBC); and Debbie Palfrey (WRAP Cymru) to undertake a routine site inspection. Thank you all for taking the time to attend the inspection and for explaining the different waste streams accepted at your facility, the site processes and infrastructure.

(B3) Site drainage engineering (clean & foul)

Whilst onsite the drainage was assessed; the site benefits from an impermeable, concreted surface to prevent any spillage from entering ground water. The drainage was funnelled in to an interceptor which is maintained on a biannual basis.

(B4) Containment of stored materials

During the visit the storage conditions of the waste electrical and electrical equipment (WEEE) was raised, having sought guidance on this matter as NRW seeks to approach this matter consistently across the industry sector; current NRW guidance is that so long as the permitted site has a well maintained impermeable surface and adequate drainage the storage of WEEE outdoors is accepted with the proviso that the waste is being stored for recycling and not for re-use.

(C1) Staff competency/training

Mark Phillips WAMITAB Continuing Competence up to date.

(C4) Storage, handling, labelling and Segregation

The waste stored on site was done so in appropriate containers and all waste types were separated and had good signage to aid members of the public as to which container their waste should be disposed of. All liquid waste on site was segregated and held in bunded containers.

The Dowlais site houses the Merthyr Tydfil County Borough Council asbestos disposal unit. The container is sealed and all waste that is disposed has to be double bagged. The container is in a good state of repair and there are hazard kits on site for staff in the event of a bag breach.

(D1) Site security

The site is surrounded by an electrical fence to deter would be intruders and has security cameras which are monitored by off site security. All of the security installations have been installed recently. The site experienced a break in recently where the cabin was broken in to from an adjacent yard. The site of the cabin has since been moved to prevent the cabin being used as platform in to the site.

(D2) Accidents, emergency and incident planning

There are spill kits available at the facility in the event of any oil spillages.

(F3) Dust/fibres/particulates and litter

The overall condition of the site was very clean, there was no litter on the floor and the boundary surrounding the site was also clear of litter and debris from site activity. The site perimeter fencing has a net to catch any windblown litter from escaping the site which helps to prevent waste from entering the surrounding area.

Other comments

This Household Waste Recycling Facility will pass from Potters to Merthyr Tydfil County Borough Council for operational control in the near future. Both Christian Jones and Stephen Thomas are in the process of gaining the WAMITAB certification.

MTCBC will be moving to a system where if residents deposit black bag waste at the site they will be requested to open the bag and deposit the waste in the correct waste bins on site.

The site is due to undergo a reconfiguration in the near future to allow for two cars to pass each other on the causeway around the site.

If you have any queries relating to this form, please do not hesitate to contact me on the details below.

Craig Coleman

03000 65 4363

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EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033597**

This form will report compliance with your permit as determined by an NRW officer

Site	Dowlais C/a Site	Permit Ref	ZB3797TH
Operator/Permit holder	Sundorne Products (Ilanidloes) Ltd	Date	03/07/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.