

Compliance Assessment Report CAR_NRW0037887

Permit being assessed: DP3099FV.

For: Mitchell Troy Household Waste Recycling Centre, held by Dragon Waste Limited
At: Mitchell Troy H W R C, Mitchel Troy, Monmouth, Monmouthshire, NP25 4HX.

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

On 22/04/2021 between 09:30 and 10:00.

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

NRW Lead Officer: Greg Gardner, accompanied by Alastair Krzyzosiak.

Report sent to: Marcus Hogarth, Operations / Technically Competent Manager on 30/04/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
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)	
B4 - Infrastructure - Containment of stored materials	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?

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 report details the site visit made on the 22 April 2021 to Dragon Waste Ltd. located at Mitchel Troy HWRC, Mitchel Troy, Monmouth, Monmouthshire, NP25 4HX, permit number, EPR-DP3099FV.

Officers Greg GARDNER and Alastair KRZYZOSIAK attended the Dragon Waste Ltd, Monmouth Facility for a routine site inspection of their environmental permit, EPR-DP3099FV. The inspection took place at 09:30am where I met with Mr. Marcus HOGARTH (Operations Manager). The weather was dry and sunny which it had also been the previous day.

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 people/property/environment
- 2 - Significant impact or 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
Waste Disposal Licence No. 5/93 issued	11/02/94	Waste disposal licence issued to Dragon Waste Limited for a non-hazardous Civic Amenity site.
EAWML 30118 modified (previously No. 5/93)	01/09/96	Waste management licence modified for the inclusion of condition 5 – maximum quantity of waste to be accepted as 4,999 tonnes per annum.
EAWML 30118 modified	29/03/99	Waste management licence modified to include conditions requiring the operator to complete records of the movement of waste.
Variation determined EPR/DP3099FV/V004 (previously EAWML 30118)	26/03/13	Varied and consolidated permit issued in modern condition format.
Application EPR/DP3099FV/V005	Duly made 09/09/13	Administrative variation application to include additional waste types.
Variation determined EPR/DP3099FV	02/10/13	Varied permit issued.

End of introductory note

ACTIONS FROM PREVIOUS CAR FORMS

Criteria	Action needed	Complete by
G4	Please submit your outstanding waste Returns documents (quarter 1 2020) to NRW for review by 1 March 2021.	01/03/2021

COMPLETE - The outstanding waste return data (Quarter 1, 2020) has been submitted and uploaded to NRW systems.

GENERAL OBSERVATIONS

Dragon Waste, Monmouth operates under a bespoke permit as a Household Waste Recycling Centre (HWRC) for public use in the Monmouthshire area. This site is permitted

to accept non-hazardous and hazardous wastes including Waste from Electrical and Electronic Equipment (WEEE). The total quantity of waste accepted at site shall not exceed 4,999 tonnes a year. The site is operational however on Mondays and Thursdays the site is closed for any maintenance / cleaning / removal of bins. There was no waste stored outside of the designated permit boundary at the time of site inspection.

SITE INFRASTRUCTURE

The general housekeeping on the site was in good condition with no evidence of loose debris located on the floor (as seen in photo 1). A regular cleaning regime is in place during most operational days and mainly on non-open days (Mondays and Thursdays) to maintain this standard. The flooring was in good condition with no evidence of infrastructure damage and the on site interceptor drainage system was operational with no issues identified. The interceptor drainage system, according to Mr. HOGARTH, is cleaned / checked weekly on site and also monthly. The site was secured with locked gates, high barbed wire fencing and floodlighting to prevent intruders and was of no concern at the time of site inspection.



Photo 1 - Location of main bin storage area with well kept housekeeping standards.



Photo 2 - Site flooring / drainage in good condition with no apparent damage/ issues

WASTE ACTIVITIES - GENERAL

The site had numerous skip containers (as seen in photo 3) 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 to members of the public. The site was abiding by current COVID-19 restrictions by only allowing a small number of vehicles access to the site to drop of waste at any one time via a booking system. The majority of household waste is taken to Viridor's Cardiff Energy Recovery Facility (ERF) at Trident Park.



Photo 3 - Clearly labelled household waste skips

WASTE ACTIVITIES - HAZARDOUS

The site is permitted to accept hazardous waste such as chemicals and WEEE. This was stored securely in a bunded area (as seen in photo 4) with any potential loss of containment captured via the sites interceptor drainage system. The integrity of the sealed containers was good with no evidence of any loss of containment of hazardous substances. Paints were stored within IBC's (Intermediate Bulk Containers) and reprocessed by Viridor again, within bunded area with any potential loss of containment isolated within the sites interceptor drainage system. WEEE is removed, transported and handled by Repic UK.



Photo 4 - Hazardous waste storage with concrete bund located around perimeter of area**Photo 5** - Further hazardous waste storage on site**WASTE RETURN SUBMISSIONS**

Dragon Waste, Mitchell Troy are currently up to date with their waste return submissions. Further details of the waste return data can be found on a separate CAR form that was issued for this site on 12/02/21, Report ID - CAR_NRW0037323. The deadline for submission for Quarter 1, 2021 is 30th April 2021. Further detail on submission deadlines and waste returns can be found on the below link.

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

Waste Return Submissions - [Natural Resources Wales / Submit your waste return](#)

Officers Greg GARDNER and Alastair KRZYZOSIAK left site at 10:00am the same day.

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

I look forward to working with the site in 2021.

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.