

Compliance Assessment Report CAR_NRW0037914

Permit being assessed: BB3998CQ.

For: Europest Environmental Services Ltd, held by EUROPEST ENVIRONMENTAL SERVICES LIMITED

At: Unit G, Trecenydd Business Park, Caerphilly, Caerphilly, CF83 2RZ.

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

On 27/04/2021 between 10:15 and 11:40.

Parts of permit assessed: 1, 2, 3 & 4

NRW Lead Officer: Jak Rose, accompanied by Alex Bowder.

Report sent to: Morgan Francis, Operator on 30/04/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Action only (X)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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
C1	Obtain WAMTAB operator competence qualification. You will have the 12 months to get obtain this qualification.	21/01/2022
C2	Please submit your most recent EMS document for us to assess and provide feedback.	30/07/2021

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 inspection made on 27 April 2021 for Europest Environmental Services Ltd located at Unit G, Trecenydd Industrial Estate, Trecenydd Business Park, Caerphilly CF83 2RZ - Permit Number EPR- BB3998CQ.

Environment Officer Jak ROSE and Senior Regulation Officer Alex BOWDER attended Europest Environmental Services at 10:15 to carry out an introductory inspection of environmental permit EPR-BB3998CQ. Officers was met by the Service Director/Operator Mr. Morgan FRANCIS who was present throughout the visit. Officers went through the First Inspection Checklist in the office before walking around the site building. The weather conditions were dry and mild at the time of inspection.

Officers discussed intended waste operations. A first inspection checklist was completed (and signed by the operator) with the various requirements of the permit explained.

COMPLIANCE

Following each assessment Natural Resources Wales (NRW) will produce a Compliance Assessment Report (CAR) detailing our comments from the visit. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach activities against your permit conditions. This has the potential to affect your site banding and annual subsistence fees; these are 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 EPR-BB3991ZK

On 19 January 2021, the operator was issued a Standard Rules permit (SR2008No24) for a clinical waste & healthcare waste transfer station.

There were minimal waste activities taking place at the time of inspection, with operations looking to restart in the next few months. The operator plans to contact the landowner in respects of the permit. Officers discussed the history of the site and the importance of complying with all the permit conditions and respective site management documents going forward.

SITE OBSERVATIONS

The rear of the premises is where the fleet vehicles collecting the waste drive into and unload. The yard infrastructure appears to be in good condition. Officers suggested during busy periods it would be good practice to keep the entrance clear of obstructions to avoid any trips, slips and falls which may result in damaged bags and possible leakage. The container which was previously used to store bags of offensive waste is currently empty as seen in image 1.



Image 1 – showing the storage container with various items in. There is currently no waste being stored in here due to reduced operations, taken on 27 April 2021.

Primarily, the business intends to deal with washroom offensive waste collected from the hospitality sector and will be stored within containers such as the one above. The business is also permitted to accept and store hazardous waste from clinical settings such as nursing homes before it is taken to a permitted facility.

PERMIT SPECIFICATIONS – Waste acceptance

Waste shall only be accepted at if it complies with the condition in 2.2.

You must make sure that the advice you give to waste producers about segregating and

packaging waste follows the **Safe Management of Healthcare Waste (HTM 07 01)**.

Further information on the appropriate measures for waste pre-acceptance, acceptance and tracking at regulated facilities with an environmental permit for treating or transferring healthcare waste can be found at: <https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities/waste-pre-acceptance-acceptance-and-tracking-appropriate-measures>

Storage

The container in **image 1** appears to be secure and lockable. However, it was discussed that the floor may not provide an impermeable surface. Rigid containers for the storage of waste shall be of a design that:

- Will prevent the escape of any liquid

Further information in Operating Techniques table 2.3 will outline further detail such as the different types of hazardous wastes and how they must be stored while awaiting transportation.

ENVIRONMENT MANAGEMENT SYSTEM (EMS)

Officers spoke about how permit condition 1.1.1 requires the operator to manage and operate the activities *"in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints"*.

As discussed, you have already incorporated elements of the new permit into your current EMS. The EMS should be treated as a live document and therefore updated accordingly to reflect any change in operation, for example. More information can be found under the *'How to comply with your environmental permit'*

guidance:<https://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

Action

Please submit your most recent EMS document for us to assess and provide feedback.

TECHNICALLY COMPETENT MANAGER (TCM)

Condition 1.1.4 requires the operator to comply with the requirements of an approved competence scheme. The operator Morgan FRANCIS presented his Environmental Permitting Operating Certificate (EPOC) certificates and confirmation of this in December 2020. Please remember to complete the WAMTAB operator competence qualification. You will have the 12 months to get obtain this qualification.

Action

Please submit evidence of completing this by January 2022.

SITE DRAINAGE AND INFRASTRUCTURE

The permit requires all specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system. Most of the site flooring is considered hardstanding but it may be beneficial to notify the landlord of the operations now taking place and the potential run off from escaped liquids.

WASTE RETURNS

The Officer discussed how condition 4.2.2 requires the operator to submit its waste return tonnages for all materials inputs and outputs **every quarter**. It is important to accurately document all tonnages with the correct waste codes so that we can view the audit trail of the waste. This must be submitted every quarter, even for a **null return**.

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

Hazardous Waste Returns

Hazardous waste consignee returns are completed to inform us about the hazardous waste consignments that have been received, removed or disposed at a site. They are a compulsory requirement of the Hazardous Waste Regulations 2005.

Like the above which is for non-hazardous waste, you must send us a consignee return reporting what hazardous waste has been received at your premises, every quarter.

We look forward to working with the site in 2021. If you have any issues with this report, please contact Officer Jak Rose on jak.rose@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.