

Compliance Assessment Report CAR_NRW0038449

Permit being assessed: AP3499FY.

For: Llanfoist Waste Transfer Station, held by Dragon Waste Limited

At: Llanfoist, Abergavenny, Monmouthshire, NP7 9AQ.

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

On 28/06/2021 between 10:00 and 10:45.

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

NRW Lead Officer: Greg Gardner.

Report sent to: Marcus Hogarth, Operations / Technically Competent Manager on 12/07/2021.

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 28 June 2021 to Dragon Waste Ltd. located at Llanfoist, Abergavenny, Monmouthshire, NP7 9AQ permit number, EPR-AP3499FY.

Officer Greg GARDNER attended the Dragon Waste Ltd, Llanfoist Facility for a routine site inspection of their environmental permit, EPR-AP3499FY. The inspection took place at 10:00am where I met with Mr. Marcus HOGARTH (Operations Manager). The weather was dry with some intermittent drizzle 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
Original Waste Disposal Licence 2/93 issued	18/06/93	Application for household, commercial and industrial waste transfer station.
EAWML 30101 modified (previously 2/93)	29/03/99	Modification to include records of all waste inputs and outputs and the requirement for quarterly returns.
EAWML 30101 modified (previously 2/93)	23/12/04	Modification to the types of waste to be accepted at the transfer station and household recycling centre.
Variation EPR/DP3599FS/V004 determined	18/12/09	Variation to extend the site area, include new waste types and consolidation to cover all the site activities, including waste transfer operations, waste amenity site operations and storage of WEEE.
Variation EPR/AP3499FY/V005 determined	19/01/10	Variation to amend the permit number which was incorrect on the variation notice dated 18/12/09.
Variation application EPR/AP3499FY/V006	Duly Made 30/03/12	Variation to include wastes accepted at the waste transfer station under EWC 20 01 99.
Variation EPR/AP3499FY/V006	02/04/12	Varied permit issued to Dragon Waste Limited

GENERAL OBSERVATIONS

Dragon Waste, Llanfoist operates under a bespoke permit as a Household Waste Recycling Centre (HWRC) for public use in the Monmouthshire area as well as a waste transfer station. This site is permitted to accept non-hazardous and hazardous wastes. The total quantity of waste accepted at site shall not exceed 40,000 tonnes a year. The site is operational and was so during the site inspection. 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 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 which is similar to the

Dragon Waste, Caldicot site. The site was secured with anti-climb fencing and cameras and was of no concern at the time of site inspection.



Photo 1 - Site flooring infrastructure in good working order with no concerns over integrity

The site has a storage area for empty and full storage skips. These skips, when full, are only stored for a small amount of time prior to removal off site for further processing. The site has an onsite skip vehicle which removes full bins from the HWRC section and replaces with empties. These large bins were stored within the permit boundary and not a cause for concern during the site inspection.

WASTE ACTIVITIES - HOUSEHOLD WASTE RECYCLING

The site had numerous skip containers (as seen in photo 2) 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 2 - Clearly labelled household waste skips for public use

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 3, 4 & 5) 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. Battery waste, as seen in photo 3, (both car and household) is removed, transported and handled by Enva (car batteries) and Mercury (household batteries). Any waste oils were stored within a tank (as seen in photo 4) and is monitored by on site operational staff to ensure it does not overflow. When full or ready to be emptied, Slicker Recycling attend site to remove the oil waste. There were no concerns regarding the storage or handling of the hazardous waste at the time of site inspection.



Photo 3 - Hazardous waste storage within interceptor drainage system area



Photo 4 - Oil waste storage within interceptor drainage system area



Photo 5 - WEEE waste storage within interceptor drainage system area

WASTE ACTIVITIES - WASTE TRANSFER STATION

The site also houses a waste transfer station (as seen in photo 6, 7 & 8) with numerous bays containing various waste streams ready for transportation for further processing. The housekeeping of the bays were in good working order with no causes for concern from an environmental / health & safety issue. Wood waste is transported to South West Wood Products, Newport with glass bottles transported to Roydon Bottle Recycling Ltd, Pontllanfraith. The majority of household waste is taken to Viridor's Cardiff Energy Recovery Facility (ERF) at Trident Park.



Photo 6 - Waste Transfer Station section holding various waste streams within covered housing



Photo 7 - Waste Transfer Station section holding various waste streams within covered housing



Photo 8 - Waste Transfer Station section holding various waste streams within outside

It was noted during the site inspection the small presence of scavengers (birds) flying to and from the waste transfer building in search of food. This wasn't seen as a cause for concern during the site inspection due to the amount of scavengers as well as the transfer station roller shutter doors being closed in during non-operational hours. It was noted to Mr. HOGARTH, during the site inspection, as an option to help prevent any more scavengers from returning and thriving, to potentially install a scavenger prevention system such as an acoustic dispersal system / alarm if required.

WASTE ACTIVITIES - REUSE AREA

During the site inspection, Mr. HOGARTH escorted me to the scrap metal reuse area which is owned by Monmouthshire County Council, as seen in photo 9. This area of the site is operational. Scrap is collected from the adjoining Llanfoist Waste Transfer Station and HWRC, if the operators believe there is value in the scrap metal, and is placed in this area. Monmouthshire County Council will then reuse / resell these items for money to enable them to plant more trees across the county (as seen in photo 10). This is a good example of

environmental work practices taking place. Albeit this area is owned by Monmouthshire County Council, there were no environmental concerns at the time of site inspection.



Photo 9 - Scrap metal reuse area located at Five Lanes Transfer Station and HWRC



Photo 10 - Tree planting initiative from Monmouthshire County Council

WASTE RETURN SUBMISSIONS

Dragon Waste, Caldicot are currently up to date with their waste return submissions. Further detail on submission deadlines and waste returns can be found below and on the attached link.

For 2020, this site accepted 26,565.64 tonnes of waste and removed 24,926.17 tonnes which is within their permitted allowance. There were no waste codes identified that were not permitted to be accepted for this site.

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](#)

Officer Greg GARDNER left site at 10:45am 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.