

Compliance Assessment Report

Report ID:
CAR_NRW0033901

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

Site	The Granary	Permit Ref	EP3994LG			
Operator/Permit holder	Caerphilly Skip Hire (C W S) Ltd					
Regime	Waste Operations					
Date of assessment	04/09/2018	Time in	10:30	Out	11:15	
Assessment type	Site Inspection					
Parts of the permit assessed	Various					
Lead officer's name	Lee, Jonathan					
Accompanied by						
Recipient's name/position	Alun Pitten/ Finance Director	Date issued	06/09/2018			

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
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3	2.1.1
B4 - Infrastructure - Containment of stored materials	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Officer Jonathan LEE attended Caerphilly Skip Hire (CWS) Ltd on Tuesday 4th September 2018 at 10:30am. The weather was overcast at the time of inspection. The visit was made to complete a routine inspection of **EPR-EP3994LG**, and to obtain an update on the progress of improvements to site infrastructure.

Inspection

Site was operationally busy at time of inspection, with various waste streams being sorted into distinguishable fractions. Larger skips being used for onward transfer of sorted waste fractions. Picking belt was operational and under shelter.

Drainage Infrastructure

The site was previously visited by officer Jonathan LEE on the 17th May 2018. This visit raised an action point for the operator to ensure that the site drainage is fully sealed, so that run-off should only be able leave through the interceptor. This matter was also noted as an action point during a visit by officer Alex BOWDER on the 26th March 2018.

The operator has made partial improvements to site infrastructure to ensure site drainage is fully sealed in line with permit condition 2.1.1. A concrete lip has been constructed at the bottom of the gabion wall. In addition, a small lip of concrete has been added to the top of the ramp which leads to the exit of the site. See pictures one and two below.



Picture 1: Concrete lip at the base of perimeter gabion wall on eastern flank of site.



Picture 2: Concrete lip at the top of the exit ramp of the site.

Permit condition 2.1.1 states that 'The operator is only authorised to carry out the activities specified in schedule 1 table S1.1', which is shown below.

Schedule 1 - Operations

Table S1.1 activities		
	Description of activities for waste operations	Limits of activities
Non-hazardous waste transfer station	R13 Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	Storage of non-hazardous waste shall be carried out on an impermeable surface with sealed drainage.
	D15 Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)	There shall be no treatment of waste other than sorting for the purpose of recovery only.
	Discharge of integral site drainage from the emission (discharge) point indicated on the plan in Schedule 7 of this permit.	Waste types as specified in Table 2.1 Drainage consisting solely of: <ul style="list-style-type: none">- clean, rainfall dependant drainage from areas of the site used in connection with the storage or treatment of waste, and- run-off from the impermeable surface from the storage and processing of waste, via suitable, well maintained interceptors. No visible oil or grease shall be present in the discharge.

Whilst significant improvements to site infrastructure have been made recently, run-off is still able to bypass the interceptor on site. A concrete lip needs to be constructed along the complete perimeter of the impermeable surface so that flow is directed towards the entry hole of the interceptor. This would ensure that site drainage is fully sealed. At the time of inspection, it was visible that the run-off from the site can bypass the site, as shown in picture three below.



Picture 3: Edge of impermeable surface at southern end of site.

Given the historical action points raised regarding this matter and the visible run-off at time of inspection, you have been scored a **Category 3 breach** of permit condition 2.1.1.

Action: You must ensure site drainage is fully sealed, run-off should only be able to leave the site via the interceptor. Please construct a concrete lip to direct run-off towards the entrance drain of the interceptor.

Other comments

Operator is intending on submitting a permit variation to extend the boundary of the site, increase throughput of the facility and add some additional treatment operations. Correspondence regarding this matter has been sent separate to this CAR form.

No other issues identified at time of inspection. Waste returns have been submitted on time.

If you have any issues with this report please contact Jonathan Lee on 0300 065 3908 or jonathan.lee@cyfoethnaturiolcymru.gov.uk

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.

EPR Compliance Assessment Report

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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.

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			
B3	C3	Construct concrete lip to direct run-off towards the interceptor and ensure site drainage is fully sealed	12/10/2018

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.