

Compliance Assessment Report CAR_NRW0038564

Permit being assessed: JB3893HP.

For: Site Serv Recycling Ltd, held by Siteserv Recycling (sw) Limited

At: Llandow, Cowbridge, CF71 7PB.

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

On 21/04/2021 between 10:30 and 12:30.

Parts of permit assessed: Accident, Emergency and Incident Planning

NRW Lead Officer: Loku Ranasinghe, accompanied by Yeliz Marshall.

Report sent to: Debbie Foggarty, Operations Manager on 19/08/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D2 - Incident Management - Accidents, emergency and incident planning	C3 Minor	3.4.2

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

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
D2	Submit a revised FPMP by 30th September 2021	30/09/2021

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

Officers Loku Ranasinghe and Yeliz Marshall from NRW and FRS Officers Stuart Brock and David Thomas visited Siteserv. The joint visit was organised, following the fire that was reported to and attended by FRS

on 10/04/21 to: from NRW perspective check FPMP compliance and from FRS perspective in an advisory capacity to NRW on FPMP compliance as well as to carry out a Fire Safety Audit. As such only Hangar A area was considered.

Details of the incident

It is understood from the information given to us during the visit the cause of the fire on Friday 09/04 is the Hogger / shredder (which has now been removed from the shop floor) , but this has been contained by the sprays on board after the alarm on board had gone off . It is thought the embers from this had floated up and landed on the rafters which had deposited dust and had started smouldering which was then noticed around Sat -10/04 afternoon. This ties in with the FRS Incoming incident report.

Breach

(d2) Accident, Emergency and Incident Planning – Category 3 - condition 3.4.2

3.4.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities could cause a fire risk, submit to Natural Resources Wales a fire prevention plan which identifies and minimises the risks of fire;
- (b) operate the activity in accordance with the fire prevention plan, from the date of submission, unless otherwise agreed in writing by Natural Resources Wales.

Dust build-up within the building

The FPMP Guidance Section 6 refers to Common Causes of Fire and Preventative Measures:

Build-up of loose combustible waste, dust and fluff - Your plan should state how regularly you will inspect and clean the site to prevent the build-up of loose combustible waste, dust and fluff within buildings & around the site.

While we have seen the filled cleaning checklists on the machinery it is clear that the deposited dust in the building continue to be a fire risk. We understand from staff that measures are being put in to place to allow cleaning of the rafters. It is advised that in a revised FPMP (as mentioned below) measures to deal with preventing the build-up and cleaning of deposited dust in the building is addressed.

It must be noted that any changes to activities that increase the risk of fire needs to be accompanied by changes to the FPMP in line with the above guidance and approved by NRW. In the current scenario this has not happened, has led to the above mentioned incident. Therefore this is a breach of the permit conditions as above.

Stack Dimensions

The following relates to the baled paper and cardboard on the left-hand side as you enter the Hangar A, as seen in the picture below.



The largest bales stack size was 17m x 10m x 5 stacks. This stack size is not in line with the approved FPMP's stated dimensions – 10m x 10m x 4m and therefore breaches the Environmental Permit as above.

However we include the below observations based on the FPMP Guidance, to account for what we observed on the day of the visit, and in case you wish to incorporate in to a revised FPMP.

We considered the separation distance of the longest baled stack of 17m x 10m. You need to have 3 separation distances:

1. for 17m length side would need to be 16m to the bales opposite. The actual distance was well above that, therefore compliant for this aspect.
2. 10m width side to loose paper stack next to it would need to be around 7m. The current separation distance is not compliant with this requirement.





3) 10m width side stack to building would need to be 11m. The current separation distance is not compliant with this requirement.

Stack height exceeded 4m in several instances-as seen in the photo above in some instances where the bales are 5 stacks high.

The FPMP Guidance in Section 12 states -Separation between internally stored wastes and building walls, plant & other equipment within buildings will need to be considered.

Specifically, The fire risk within a building, namely fire spread and risks associated with extinguishing a fire, increases significantly in comparison to a fire in the open, and the resulting environmental harm could also be significant.

Therefore it is imperative that the stack sizes and separation distances as specified in the FPMP (and as laid down in the Guidance where FPMP does not cover this) are maintained at all times, particularly as this is inside a building.

While we observed reduced volumes compared to our previous visits the volume of waste inside the hangar increases substantially at times, therefore to hold this volume and to be in line with guidance fire walls should be considered. It is stated in the last approved FPMP of Feb 2018 in the section titled "Site storage-risk reduction that fire walls are envisaged to be in place by 31/03/2020.

For Action**Proposed Sprinkler system for Hangar A**

We understand that you intend to install a water sprinkler system within the Hangar A building and this will also have an alarm system. We also understand that you propose to install a water tank with 72,000 litre capacity.

This may mean the need for a revision of the current approved FPMP. Based on our consultation with the Fire Service, the revised FPMP will need to include, among other things, details of the system such as

- how the tank will be filled (whether by mains water)
- Sufficiency of fire fighting water for how long Include this as an action
- Fire Hydrants Locations – (You will need to check with Welsh Water for a location map of fire hydrants. Please provide us with details of location and accessibility)

Awareness of FPMP and training/tool box talks

We need you to confirm/ update who has the responsibility to implement the FPMP provisions since Carl Jones left.

Training – The current FPMP refers to 6 monthly training sessions. Please ensure these include raising awareness of the provisions of the FPMP and there is a sign off procedure to ensure that all staff have received the relevant training.

Also any Monthly Tool box talks need to be recorded.

The above provision will need to be referred to in the revised FPMP.

The revised FPMP will need to take in to account any changes to the site since the last approved FPMP and specifically any advice given and included in the CAR forms from previous site inspections.

Action- Please submit a revised FPMP by 30th September 2021.

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.