

Compliance Assessment Report CAR_NRW0038833

Permit being assessed: PP3094FA.

For: Plot 57 Brynmenyn Ind Est, held by A C D Skips Ltd

At: Bridgend, Glamorgan, CF32 9SQ.

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

On 08/06/2021 between 10:00 and 11:00.

Parts of permit assessed: General Management and Incident Management

NRW Lead Officer: Yeliz Marshall, accompanied by Gareth Davies.

Report sent to: Viv Hughes, Director on 15/10/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	C3 Minor	1.1.1(a)
C3 - General Management - Materials acceptance	C3 Minor	2.2.1(a)
D2 - Incident Management - Accidents, emergency and incident planning	C3 Minor	3.4.1

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

Total number of non-compliances recorded	Total non-compliance score
3	12

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
C2	Ensure that all waste materials are consigned as waste and handled as such.	18/10/2021
C3	Ensure that the waste is removed to an authorised waste facility and provide the waste consignment notes.	30/11/2021
D2	Revise the FPMP as instructed in the FPMP review section of this report and submit to NRW for approval.	31/01/2022

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

Senior Waste Regulation Officer Yeliz Marshall and Team Leader South Central Waste Regulation Gareth Davies have undertaken a permit inspection visit, at ACD Skips Limited Plot 57 Brynmenyn Industrial Estate Brynmenyn, Bridgend, Glamorgan, CF32 9SQ site on 08/06/2021. The weather condition was warm and dry at the time of the visit. The Operator was represented by their TCM initially then with the arrival of the Director of the company; the visit continued with both the TCM and the Director present. ACD Skips Limited has another permitted facility across the street, which was also inspected as part of the visit. Outcome of that inspection is summarised and issued in a separate CAR report. This report will focus on the Plot 57 site.

NRW officers explained the purpose of their visit as to undertake a routine inspection of the site with the focus on the use of WRAP Quality Protocol (QP) – Aggregates from inert waste – End of waste criteria for the production of aggregates from inert waste.

Following our site visit and upon reviewing of your submitted Fire Prevention & Mitigation Plan (FPMP), it can be confirmed that the current FPMP does not comply with the FPMP Guidance.

CCS Score C3 breach of Section 3.4.1 of the permit - D2 Incident management – Accidents, emergency and incident planning

3.4 Fire

3.4.1 The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.

Because

The current FPMP does not comply with the FPMP Guidance. Please see the FPMP review included in this report and assigned related actions to revise the FPMP to bring in compliance with the FPMP guidance.

Current Operations at Site

ACD skips is a permitted facility located at Unit 57 on the Brynmenyn Industrial Estate, Bridgend. The facility is covered by Standard Rules 2008_No3 Household, Commercial and Industrial Waste Transfer Station with Treatment.

Construction and demolition (C&D) waste is received on site accompanied by a completed Waste Transfer Note (WTN) and is visually checked to ensure it is compliant with the list of acceptable wastes within the permit.

Mixed skips containing wastes unsuitable for aggregate are emptied on the ground and sorted. Waste suitable for aggregate is treated on site as detailed below. All other materials recovered from this operation are segregated in skips and removed from the site as waste.

All construction and demolition waste suitable for the production of aggregate is put through a trommel, air blower, picking station and a second trommel to separate it into its constituent parts and to ensure all contaminants are removed. The rubble is then crushed to a size grade of "4 inches down". The wastes are then stored in the external yard area pending removal from site.

All waste is visually inspected prior to being removed from site however no further testing is carried out on the aggregates no record is made of these findings of these visual inspections.

Aggregates are removed from site as non-waste under the Aggregates QP to be used as General Fill. However, the material is **not compliant** with the QP as summarised under Aggregates QP Compliance Review section below.

CCS Score C3 breach of Section 1.1.1 (a) of the permit - C2 General management – Management system and operating procedures

1. General Management

1.1.1 The operator shall manage and operate the activities: (a) 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; and

Because

This is a breach of section section 1.1.1(a) as you do not have an effective management. According to the 'how to comply with your permit' document "an effective management system will enable you to manage compliance with your permit and **any other legal requirement** to protect the environment".

Consigning waste material as non waste is a breach under Section 34 of the Environmental Protection Act 1990, which is a directly applicable legislation that states anyone who produces, imports, keeps, stores, transports, treats or disposes of waste must take all reasonable steps to ensure that waste is managed properly.

Please ensure that all waste materials are consigned as waste and handled as such.

Aggregates QP Compliance Review

The end of waste criteria for the production of aggregates from inert waste is set out in the Quality Protocol (QP) produced by the Waste and Resources Action Programme (WRAP) as updated in October 2013. Included in these criteria are a list of acceptable incoming waste codes, the requirement for the production of a Factory Production Control Manual, minimum testing requirements for all outgoing material and suggested good practice for the transport, storage and use of the recycled aggregates.

- Mixed waste skips are accepted on site containing mixtures of rubble mixed with wood and / or plastic. Such mixtures would come under the EWC code 17 09 04 mixed construction and demolition wastes. The QP states that wastes can only be accepted under this code if:

- a. The waste is generated from utilities trenching's.
 - b. The waste consists of subbase aggregates i.e. granular material.
 - c. The waste contains only materials that would be described by entries 17 01 01 (concrete), 17 03 02 (Bituminous mixtures) and 17 05 04 (Soil and Stones) if the waste was not mixed.
- A C D Skips have a "Quality Management System in Place for the Manufacture of Aggregates from Inert Waste" (QMS). This was produced in 2007 and describes the operations on site for the production of non-waste aggregates from inert waste. This has not been updated in line with the QP which was reviewed and updated in October 2010.
 - Aggregate is sent off site as general fill however the testing plan in place (visual only) does not conform to the minimum testing requirements as detailed in the QP.

As a result of the above outlined issues, at present A C D skips are not compliant with the QP for the production of aggregates from inert waste. This means that the aggregates produced on site do not currently meet the End of Waste criteria and should be considered waste and handled as such until such time as processes have been updated on site to be compliant with the QP.

If you wish to send aggregates off site as non-waste under the WRAP Quality Protocol, please ensure that policies and procedures on site are updated to meet the criteria as set out within this document, until then ensure all aggregates are removed from site as a waste product to a suitably authorised site, accompanied by the appropriate Duty of Care Paperwork.

At the time of the visit it was observed that there were a number of fridges and freezers being stored on site; this is a breach of the permit.

CCS Score C3 breach of condition 2.2.1(a) of the permit - C3 General management – Materials acceptance

2.2 Waste acceptance

2.2.1 Waste shall only be accepted if: (a) it is of a type and quantity listed in table 2.2 below; and

Because

The fridge and freezers are non-permitted waste types. Please ensure that this waste is removed to an authorised waste facility.

INFRASTRUCTURE

The drains are maintained on an ad hoc basis. There were no issues with the drainage system at the time of inspection. There are slot drains at the front of the yard entrance that capture any run-off from the surface, which is then connected to the system. The operator mentioned that all surface water runoff is discharged to foul sewer, authorised by a Trade Effluent discharge consent obtained from Welsh Water.

The infrastructure seemed in good condition with limited weakened areas. Please

remember to restore damaged areas to uphold impermeable status. No skips or waste was stored outside the permitted boundary at the time of visit.

Site Security

The site is fully fenced, and security appeared to be well maintained.

FIRE PREVENTION AND MITIGATION PLAN (FPMP) Review

FPMP guidance states that it is ideal for your plan to be available both electronically and in hard copy. Employees will need to be aware of the plan contents & have access to it at all times; it is also essential that both NRW & FRS also have access to it during an emergency. Many sites place a copy of their plan in an “emergency services box” which can be located at the site entrance or suitable location so that the FRS can access the plan out of hours in an emergency.

During the visit the site operator was not able to show us a copy of the FPMP despite searching for it in the office building for some time.

Action: Ensure that there is a copy of the FPMP easily accessible for the employees and to emergency services in the event of a fire.

The FPMP provided was produced for two permitted sites operated by ACD Skips and the other facility is located directly across the street. The FPMP refers to both sites as one entity and does not define what separate measures are in place for each site.

Action: revise the FPMP either to produce one for each facility or revise it to ensure any information provided clearly referenced to the relevant site.

The FPMP provided is not discussing all sections of the guidance without explaining why.

Action: revise the FPMP to ensure all relevant sections of the guidance and if some of the sections not applicable please state the reasons for it.

1. Fire Prevention and Mitigation Plan Contents

The fire prevention plan shall as a minimum specify:

(i) the amount & type of waste received daily and how it is managed;

The FPMP lists all the combustible and flammable waste streams accepted on-site their form, storage time, received quantity daily, maximum storage time and how they are stored. At the site visit it was confirmed that all combustible waste streams stored on this site are kept in roll-on roll-off containers except the fridges and freezers which are not permitted waste stream for this site.

(ii) the total amount of waste & the types and forms (e.g. unprocessed, shredded, chipped, fines or baled) that are stored on site at any one time and how it will be stored.

Section two of the FPMP summarises the types of wastes, form, quantity stored, quantity

stored daily (range), maximum storage time, how the material is stored in a table.

(iii) the maximum time each type of waste will be stored on site and how it will be managed;

Section two of the FPMP summarises the types of wastes, form, quantity stored, quantity stored daily (range), maximum storage time, how the material is stored in a table.

The FPMP states that all FPMP applicable waste is stored in roll-on roll-off skips.

The FPMP guidance stated that if you store waste in containers that can hold more than 1,100 litres, each one must be accessible so any fire inside it can be extinguished. Examples of these types of containers include skips, roll-on roll-off skips, or shipping containers. If you have a fire, you should be able to move containers as soon as is reasonably practicable in a safe manner to prevent the fire spreading.

Action: Revise the FPMP to set out the procedures you will put in place to allow this to happen.

(iv) the location within the site where each type of waste will be stored;

This is not specified in the FPMP and the site plan provided is not very clear as the skips hand drawn on the plan and not to scale.

Action: revise the site plan to reflect changes and make the locations of each type of waste clear and ensure all part of the site plan is created to scale.

(v) the maximum size of any waste pile, stipulating the maximum length, width and depth;

This section is not included in the FPMP presumably there is no combustible waste stored as a stockpile and they are only kept in roll-on roll-off containers

(vi) the minimum separation/fire break distance required between all waste/baled waste stacks, and between buildings and waste/baled waste stacks;

This section is not included in the FPMP presumably as combustible wastes are only stored in roll on roll off containers. However, it was noted that green waste is stored adjacent to the building. FPMP guidance states that green waste that is stored more than 3 months is at risk of self-combustion. The FPMP states that the maximum storage time for green waste is 2 weeks. Due to the proximity of the skip to the building, the operator must ensure that the storage time is not exceeded. Separation distances from the building is not clear as the skips are handwritten on the site plan.

Action: revise the site plan to add the skip locations to scale to allow measuring their distances to the building.

(viii) a clear area must be established around the perimeter of site, this can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances as illustrated in Table 2 (this must be available at all times and identified on your site plan

This is not included in the FPMP and the site plan.

Action: Revise the FPMP to establish a clear area and revise the site plans to include it within.

(viii) the fire prevention techniques used, including management of hotspots (signs of potential self-combustion), monitoring, reporting, recording and actions.

This is not included. FPMP states that wastes are only stored in roll on roll off containers and the maximum storage time specified for waste stored at this site is for green waste that is 2 weeks and the waste removed from site as soon as it is economically practical.

(ix) techniques used to minimise the risk of fire spreading within the site or from the site

In the FPMP provided it states that the roll-on roll off containers are kept away from buildings to prevent and minimise the risk of a fire or of it spreading excluding the green waste skip, which is located adjacent to the building. The FPMP guidance states that if you have a fire, you should be able to move containers as soon as is reasonably practicable in a safe manner to prevent the fire spreading.

Action: Revise FPMP to set out in your FPMP the procedures you will put in place how you will be able to move containers in a safe manner to prevent the fire spreading.

Action: Revise FPMP to set out the measures you will put in place to prevent and minimise the risk of a fire spreading from the green waste skip to the building.

(x) the steps and procedures to be followed if a fire occurs on your site;

In the FPMP states that there are two 5000 lt of tanks of rain water with a hose attachment for firefighting purposes and fire extinguishers located in the trommel sheds and the staff are trained for it and they will attempt to extinguish the fire if they are able to. A water hose available for use in the event of a fire. However, the site plan does not identify where these tanks are located.

Action: Revise the site plan to include the location of the water tank.

(xi) all combustion products and emissions (to air, land and water) from the fire and the emergency response (including the impact on the community, critical infrastructure and the environment) and how they will be minimised;

The FPMP states that there are fire alarms on the exterior walls, once these are activated a call to FRS will be made and evacuation to the muster point will begin and the site manager will be called.

The FPMP states that the firewater unlikely to have impact to surface and groundwater as there are drainage fall outside both sites and eco-drainage at the entrance of both sites that flows to the foul sewer. Any mud produced from firefighting activity to be contained within site to be cleared before any vehicle access back to the site.

(xii) contact details of sensitive receptors within 1km of your site –

The FPMP guidance states that contact details of sensitive receptors within 1km of your site should be provided – Human receptors include hospitals, nursing homes, schools, residential areas, places of work, transport networks. Environmental receptors include source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries.

Action: Revise the FPMP to add contact details of sensitive receptors within 1km of your site.

(xiii) how safe access to the site for fire and rescue services and other emergency responders is achieved

FPMP states that the site is on a public highway and the entrance is suitable for access.

Site Plan

you must include a site plan(s) drawn to scale showing:

- i. layout of buildings (including access points, fire exits & location of utilities)
- ii. areas where hazardous materials are stored (location of gas cylinders, process areas, chemicals, piles of combustible materials, oil & fuel tanks)
- iii. main access routes for fire engines (typical FRS vehicle access requirements are below) & any alternative access points around the site perimeter to assist firefighting (*see guidance for table*)
- iv. location of hydrants and water supplies
- v. any watercourse, borehole or well located within or near the site
- vi. areas of natural and unmade ground
- vii. the location of plant, protective clothing and pollution control equipment and materials
- viii. drainage systems, foul and surface water drains, and their direction of flow and outfall points
- ix. the location of drain covers, and any pollution control features such as drain closure valves and firewater containment systems
- x. location of “off- site” emergency information pack with site plan (as specified above)
- xi. location of sensitive receptors within 1km of your site –
- xii. **Human receptors** include hospitals, nursing homes, schools, residential areas, places of work, transport networks.
- xiii. **Environmental receptors** include source protection zones, surface waters, potable abstractions, groundwater, protected habitats, fisheries
- xiv. location of the **quarantine area**
- xv. assembly point for staff and visitors to site
- xvi. compass rose showing north and the prevailing wind direction

The site plan provided does not include all the relevant points listed above and is unclear with notes in handwriting and drawings added later on that were not produced to scale.

Action: Please revise the site plan to include all the relevant points above.

2. Common Causes of Fires and Preventative Measures

In the FPMP you have provided some common causes of fire, but you still may consider more options. There are other common causes of fire listed in the guidance. If you think they do not apply to your site, please state your reasons.

- **Self-combustion - (e.g. due to chemical oxidation in stored waste material)**

Self combustion is not included in the FPMP presumably as the combustible waste only stored in roll on roll off containers and the maximum storage time specified for waste stored at this site is for green waste and it is 2 weeks, which is less than what is specified in the guidance and the waste removed from site as soon as it is economical no further action required. But, if the maximum storage time stated to be exceeded; the FPMP must be revised accordingly.

- **Plant or equipment failure:**

The FPMP states that there is regular maintenance and inspection for vehicles and equipment in place to prevent over heating bearings and electrical fires from plant and equipment use and all commercial vehicles have guarded exhausts.

Damaged or exposed electrical cables - Electricians on site should be fully certified by a qualified electrician and you must have written procedures in place that set out the regular maintenance.

The FPMP states that all electrical equipment is checked according to PUWER requirements before use. Electrical appliances conform to PAT requirements and are tested annually.

- **Reactions between wastes**

You should ensure that you have written procedures within your management system for waste acceptance checks to prevent reactions **between** incompatible or unstable wastes, including lithium batteries. You must have a quarantine area available at all times and identified on your site plan.

The FPMP states that non-compliant wastes are removed on initial inspection and quarantined away from main waste storage area. However, it is unclear where the quarantine area is as it is not shown on the site plan.

Action: revise the site plan to include the location of the quarantine area.

- **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. This information is not included in the FPMP.

Action: revise your FPMP to include this information. Or state why it is not included.

- **'Tramp' metal that finds its way into moving machinery and causes localised**

‘hot spots’.

Prevent metal getting into moving machinery by pre-sorting and/or extraction by a magnet/eddy current separator, especially when ignitable or explosive materials are present. This information is not included in the FPMP.

Action: revise your FPMP either to include this information or state why it is not included.

- **Cylinders stored at the site**

should be stored in the correct manner when either in/or not in use. Cylinder storage locations should be identified on the site plan.

The FPMP states that welding undertaken for repairs to skips but unclear if there are any cylinders stored on site.

Action: revise FPMP and the plan to include the locations of the cylinders if any stored at site.

- **Leaks and spillages of oils and fuels**

You need to prevent fuels and combustible liquids leaking or trailing from site vehicles and ELVs. For example, this includes from vehicles:

The FPMP lists hazardous substances listed at the section 3 but it is unclear if this is referring to Plot 57 or the other facility.

The FPMP should include process for leaks and spillages of oils and fuel from storage of oils or trailing from site vehicles. And, you must ensure that any materials used to absorb combustible liquids are correctly disposed of to reduce the risk of a potential fire situation.

Action: revise FPMP to include a procedure to prevent leaks and spillages of oils and fuels.

3. Storage Times and Self-combustion Factors

The FPMP Guidance states: ‘Many materials can self-combust under certain conditions, and the risk generally increases when materials are stored for prolonged periods...’

‘Materials that are at risk of self-combustion if stored for more than 3 months are:

- green material, compost, wood, and wood products,
- paper and paper products,
- general/mixed waste including residual waste, RDF and ‘fines’
- tyres (whole or processed)
- smaller size or graded materials either stored or mixed
- material that has not had potential hazards removed before stacking e.g. exposed rust (which can generate heat)
- treated materials which are not cold before storage (treatment processes can generate heat)’.

'If you are storing materials at risk of self-combustion for longer than 3 months you must demonstrate what additional measures you will take, including monitoring the piles to reduce this risk. You must include this information in your FPMP.'

Self-combustion is not included in the FPMP presumably as the combustible wastes only stored in roll on roll off containers and the maximum storage time specified for wastes stored at this site is 2 weeks for green waste. And, as the wastes removed from site as soon as it is economical and considering the size of the skips this is an acceptable frequency therefore no further action required. But, if the maximum storage time stated to be exceeded; the FPMP must be revised accordingly.

4. Managing Waste Material Stacks and Separation Distances

Your FPMP does not include the information about managing stacks and separation distances as it states that combustible waste streams only stored in roll on roll off containers. It was noted that green waste is stored adjacent to the building. FPMP guidance states that green waste stored in more than 3 months is at risk of self-combustion. The FPMP states that the maximum storage time for green waste that is 2 weeks, which is the longest storage time stated in the FPMP compared to other combustible wastes also stored in skips at this site. Due to the proximity of the skip to the building, the operator must ensure that the storage time is not exceeded. Separation distances of the other skips from the building is not clear as the skips are hand drawn and not to scale on the site plan.

Action: revise the FPMP to include skips distances to the building and revise the site plan to add the skip locations to scale to allow measuring their distances to the building.

11. Enclosing Stacks Using Bays and Walls

This is not included in the FPMP presumably as you do not store waste using bays and walls therefore you do not include this information in your FPMP.

12. Waste Stored Within a Building

As you do not store applicable waste in a building; this section does not need to be considered in detail. However, as you are keeping the green waste skip adjacent to the building there must give some consideration for fire prevention and mitigation measures appropriate for the risk.

- You must ensure that all escape routes, fire exits, alarm call points and fire extinguishers are kept clear and free from waste at all times
- Ensure electrical equipment are kept free from waste, including dust and packaging materials.
- Ensure waste is kept away from ignition sources.

Action: revise FPMP to include the above considerations.

13. Waste Stored in Containers

FPMP guidance states that if you store waste in containers that can hold more than 1,100

litres, each one must be accessible so any fire inside it can be extinguished. Examples of these types of containers include skips, roll-on roll-off skips, or shipping containers.

The FPMP states that combustible waste streams at this site only stored in roll on roll off containers and away from the building. However, it was noted that green waste container is stored adjacent to the building. FPMP guidance states that green waste stored in more than 3 months is at risk of self-combustion. The FPMP states that the maximum storage time for green waste is 2 weeks, which is the longest storage time compared to other combustible waste streams also stored in skips at this site. Due to the proximity of the skip to the building, the operator must ensure that the storage time is not exceeded. In addition, the distance of the skips to the building is not clear as the skips are hand drawn on the site plan.

Action: revise the FPMP to include skips distances to the building and revise the plan to add the skip locations to scale to allow measuring their distances to the building.

Action: revise the FPMP to add consideration of accessibility of the skips so any fire inside of each can be extinguished.

14. Layout of Waste Stacks on your Site

When you have identified the potential stack sizes, storage methods/types and appropriate separation distances required at your site, you can plan the storage arrangements. See examples of stack sizes & separation distances in the section 14. Layout of Waste Stacks on your site of the FPMP guidance.

In addition to the above, there are other factors that you may need to take into account when deciding on your site/stack layout. These include the below examples as well as specific site conditions):

- Location of potential ignition sources on your site
- Location/s of occupied buildings and high-asset value equipment and plant
- Escape and evacuation routes around your site and within buildings must not be
 - compromised by stack layout
- Location of flammable and/or hazardous substances kept on site, such as gas cylinder cages, diesel tanks, quarantine areas which may contain non-conforming wastes etc.
- Locations of on or off-site fire hydrants, other water supplies and fire-fighting equipment – you do not want to block access to these with your stack layout
- Proximity and location/s of any infrastructure which may be affected by a fire, such as overhead power lines, major roads, rail lines etc.
- Proximity and location/s of any off-site, third party buildings which may be affected by a fire
- Permitted amounts of wastes, and types of waste, allowed on site
- Location of a 'quarantine' area, as appropriate to site specifics
- Operational practicalities such as movements of vehicles & designated routes
- Stock rotation requirements, seasonality of supply/off-take etc.

Action: revise FPMP to consider points raised above**15. Seasonality and Waste Stack Management**

The FPMP does not include this section; please state why. Please refer to section 15. Seasonality and Waste Stack Management of the FPMP guidance for more information.

16. Monitoring and Turning of Stacks

The FPMP does not include this section; please state why. Please refer to the section 16. Monitoring and Turning of Stacks of the FPMP guidance for more information.

17. Fire Detection

The FPMP Guidance states: 'You should ensure that you have adequate procedures in place to detect a fire in its early stages so you can reduce its impact'

For more information on what to include in this section of your FPMP, refer to the section 17. Fire Detection of the FPMP Guidance.

The FPMP states that there are fire alarms on the exterior walls, once these are activated a call to FRS will be made and evacuation to the muster point will begin and the site manager will be called but there is no mention of any fire detection systems.

Action: In your revised FPMP provide what adequate procedures are in place to detect a fire.

18. Fire Suppression Systems

The FPMP states that fire extinguishers are in place and serviced annually. A water hose is available for use in the event of fire. Operatives have been trained in the use of fire alarms and in safe evacuation procedures. Fire drills have been initiated to ensure staff are fully aware of emergency procedures.

It is not clear the locations of the fire extinguishers for the site as the listed locations does not specifically refer this site. The locations of the fire suppression equipment are not shown on the plan.

Action: revise the FPMP to list locations of the fire extigushers, specific to this site and revise the plan to show their locations.

19. Firefighting Strategy

The FPMP guidance states that it is important that you design your site layout to allow for active firefighting. Active firefighting means having the resources available on site at all times to fight a fire.

The FPMP states that emergency access is through the main gate for fire appliances and fire personnel. Hydrants are available outside each permitted area and access to the River Ogwr behind the the ACD skips other permitted site across the street, which provides a source of water for use with the fire appliances. There are two 5000 lt of tanks of rain water with a hose attachment for firefighting purposes and fire extinguishers located in the

trommel sheds and the staff are trained for it and they will attempt to extinguish the fire if they are able to. A water hose available for use in the event of a fire.

Action: There are other points raised in the FPMP Guidance that you maybe able to consider. Please refer to the section 19. Firefighting Strategy and consider other options maybe available on your site that are not included in your FPMP for example; heavy mobile plant you have available that can be used to move waste around the site amongst others.

20. Water Supplies

In the FPMP states that there are two 5000 It of tanks of rain water with a hose attachment for firefighting purposes and fire extinguishers located in the trommel sheds and the staff are trained for it and they will attempt to extinguish the fire if they are able to. A water hose available for use in the event of a fire. Hydrants are available outside each permitted area and access to the River Ogwr behind the ACD skips other permitted site across the street, which provides a source of water for use with the fire appliances.

However, the site plan does not identify where these tanks and hydrants are located.

Action: Revise the site plan to include the location of the water tank and the hydrants.

21. Managing Water Run-off

The FPMP states that the site has a drainage fall to the front gate. There is a eco-drain at the site entrance, which goes to foul water. Fire water will therefore not have a direct impact on surface or ground waters. Any mud produced from firefighting activity to be contained within site to be cleared before any vehicle access back to the site.

22. Designated Quarantine Area

The FPMP Guidance states: 'The quarantine area should be within the permitted boundary area of the site and should be large enough to both:

- hold at least 50% of the volume of the largest stack,
- have a separation distance of at least 6 metres around the quarantined waste (this can be decreased if concrete bunkers/walls will be used).

You should set out in your FPMP the location of this area and the volume of waste that it can hold.'

For more information on quarantine area refer to the point 22. *Designated Quarantine Area* of the FPMP Guidance.

The FPMP states that non-compliant wastes are removed on initial inspection and quarantined away from main waste storage area. However, it is unclear where the storage area is as it is not on the plan.

Action: revise the site plan to include the location of the quarantine area.

23. During and After an Incident

The FPMP does not include contingency measures in place for dealing with issues during and after a fire. Refer to the section 23. During and After an Incident of the FPMP Guidance.

Action: revise your FPMP to provide this information.

24. Reviewing and Monitoring your Fire Prevention & Mitigation Plan

The FPMP does not include circumstances that would warrant a review of your FPMP. Refer to the section 24. Reviewing and Monitoring your Fire Prevention & Mitigation Plan of the FPMP Guidance

Action: revise your FPMP to provide this information.

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.