

Compliance Assessment Report CAR_NRW0038840

Permit being assessed: CB3237AP.

For: Gwynedd Skip And Plant Hire Ltd, held by Gwynedd Skip And Plant Hire Ltd

At: Lon Hen Felin, Cibyn Ind Est, Caernarfon, Gwynedd, LL55 2BD.

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

On 13/10/2021 between 13:55 and 14:55.

Parts of permit assessed: See below

NRW Lead Officer: Donna Muirhead, accompanied by Daniel Grant.

Report sent to: Stacey O'Grady, Managing Director on 08/11/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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)	

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 was an unannounced visit.

Present

Donna Muirhead (Industry & Waste Regulation Officer)

Dan Grant (Hazardous Waste Regulation Officer)

Huw Jones (Operations Manager)

Weather conditions throughout the visit were overcast and drizzly.

Appearance of entry

Upon arrival the entrance and yard was free from any mud/debris and was very clean and tidy.

Observations and photos

Site was operational during the inspection with members of staff sorting out waste in the shed.

The yard was clean and tidy.



Plasterboard was segregated and kept in skips





No issues were noted relating to noise, odour, litter or pests.

Hazardous waste

Asbestos storage



Asbestos is segregated to “licensed” and “unlicensed asbestos” in skips. Both are stored in separate, clearly labelled and lockable containers as seen in Figure 1. The only issue noted was surrounding the confusion about which type of asbestos was stored in the “licensed” and “unlicensed skips”. It appeared that the labels on the skips needed to be switched. Since the visit this issue has been rectified and the labels have been correctly applied.



Figure 1. Labelled and separate lockable skips to store asbestos.

Officers requested to inspect inside the skip in order to assess its contents. All asbestos waste appeared to be stored appropriately with double bags as seen in Figure 2.

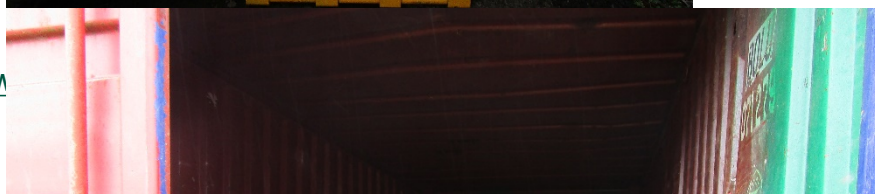


Figure 2. Inside the skip containing double bagged asbestos waste.

Hazardous waste batteries

During the visit it was noted that some waste batteries were stored on site (Figure 3). Please note, your permit only allows you to accept non-hazardous waste batteries. Officers were unable to accurately identify whether these were hazardous waste batteries or not at the time. However, the safety warning symbols on the side of some of the batteries seen in Figure 3 indicate that they might be hazardous.

You should be aware that your permit only allows you to store non-hazardous waste batteries:

- 16 06 04 alkaline batteries (except 16 06 03)
- 16 06 05 other batteries and accumulators

However, fleet vehicle repair and servicing occur on the permitted site and we understand that this process may produce hazardous waste batteries at times. Please ensure these are disposed of at an authorised facility that is permitted to accept such waste.

In the meantime, please ensure that the batteries are stored in a dry area inside an appropriate acid resistant bunded container.



Figure 3. Waste batteries stored on site without appropriate storage.

Hazardous waste Consignment note audit

During the visit the following hazardous waste Consignment Notes (CNs) for hazardous waste accepted at Gwynedd Skips were reviewed:

- EXEASL/00730
- EXEASL/00731

The following hazardous waste CNs for hazardous waste removed from Gwynedd skips were reviewed:

- CAD195/GSP__92
- CAD195/GSP__91

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

A consignment note audit was carried out earlier this year and an audit report was provided to you on our findings (e-mail dates 12/03/21). Some non-compliances that were noted in the previous audit have occurred again. Therefore, we should remind you once again that the non-compliances noted must be addressed in order for Gwynedd Skips to comply with the Hazardous Waste (Wales) Regulations 2005. Should these non-compliances continue then we may decide to take further enforcement action next time.

The main findings were:

1. Hazardous Waste Consignment Note Part A

In Wales, when 500kg or more hazardous is produced, held or stored in any 12-month period then that premise is required to be registered as a hazardous waste producer with us (NRW). Upon registering the site, the operator will receive a premises code which must be recorded in A1 and under "premises code" in your CN. The premises code recorded in your CN for outgoing waste was CAD195, this is the premises code you received when you registered in 2017. This registration has since expired three years ago.

Failure to register your premises with us is an **offence under Regulation 21 of the Hazardous waste regulations 2005.**

The following webpage provides further information on the requirement to register as a Hazardous waste producer as well as a link to renew your expired registration:

<https://naturalresources.wales/permits-and-permissions/waste-permitting/register-or-renew-as-a-hazardous-waste-producer/?lang=en>

Furthermore, you also have a duty to ensure that all parts of the CN are completed correctly prior to accepting the hazardous waste at your site. As per CN- EXEASL/0073 It was noted that 500kg of asbestos was removed from a site by "Asbestos Solutions". As a result, the site that the asbestos was removed from should have been registered with us as a hazardous waste producer but was not. You can use our public register to check for any registrations here:

<https://nrwregulatory.naturalresources.wales/HazWaste/PublicRegister/Search>

2. Hazardous Waste Consignment Note Part B

The quantity (Kg) was missing in both CAD195/GSP__91 and CAD195/GSP__92. We should remind you that inputting the quantity is a requirement under **Regulation 35 of the Hazardous Waste Regulations (Wales) 2005**.

3. Hazardous Waste Consignment Note Part C

The time that the hazardous waste was collected from your site was not recorded in this section for both CAD195/GSP__91 and CAD195/GSP__92. The time that the hazardous waste was picked up must always be recorded here in order to allow us to assess the trail of hazardous waste from cradle to grave.

4. Hazardous Waste Consignment Note Part D

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Both CAD195/GSP__91 and CAD195/GSP__92 were missing the following details in this section:

- Consignor name
- Signature
- Time

You are required to complete all details in Part D as per **Regulation 36 of the Hazardous Waste Regulations (Wales) 2005**.

5. Hazardous Waste Consignment Note Part E

Both EXEASL/00730 and EXEASL/00731 were missing the following details in this section:

- Vehicle registration number
- Name of the individual completing Part E
- A valid R or D code (under waste management operation)

You are required to complete all details in Part E as per Regulation 36 of the Hazardous Waste Regulations (Wales) 2005.

Please ensure the above is rectified upon receipt of this report. Should there be further non-compliances we may decide to take enforcement action.

Thank you for your time and all the good work.

Daniel Grant

Swyddog Gwastraff Peryglus/ Hazardous Waste Regulation Officer

Donna Muirhead

Swyddog Rheoleiddio Diwydiant a Gwastraff /Industry and Waste Regulation officer

Cyfoeth Naturiol Cymru/ Natural Resources Wales

0300 065 4910

Donna.Muirhead@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.

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.