

## Compliance Assessment Report CAR\_NRW0038951

**Permit being assessed:** JP3798FH.

For: Penrhos Depot Hazardous Waste Transfer Station, held by Ceredigion County Council

At: Llandysul, Ceredigion, SA44 4SX.

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

On 16/11/2021 between 11:30 and 12:30.

Parts of permit assessed: See criteria listed below

**NRW Lead Officer:** Ffion Quan, accompanied by Kim Jones.

**Report sent to:** Simon Edwards, TCM on 25/11/2021.

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

| Part of permitted activity assessed (criteria)                        | Assessment result | Permit condition |
|-----------------------------------------------------------------------|-------------------|------------------|
| B3 - Infrastructure - Site drainage engineering (clean and foul)      | Action only (X)   |                  |
| C3 - General Management - Materials acceptance                        | Action only (X)   |                  |
| C4 - General Management - Storage, handling labelling and Segregation | Assessed (A)      |                  |
| D1 - Incident Management - Site security                              | 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?

| Criteria | Action needed                                                                                | Complete by |
|----------|----------------------------------------------------------------------------------------------|-------------|
| B3       | Ensure that your drain/manhole covers are colour coded on site. See below.                   | 26/11/2021  |
| C3       | Please ensure that the non permitted bulky waste is moved to the quarantine area. See below. | 10/12/2021  |

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.

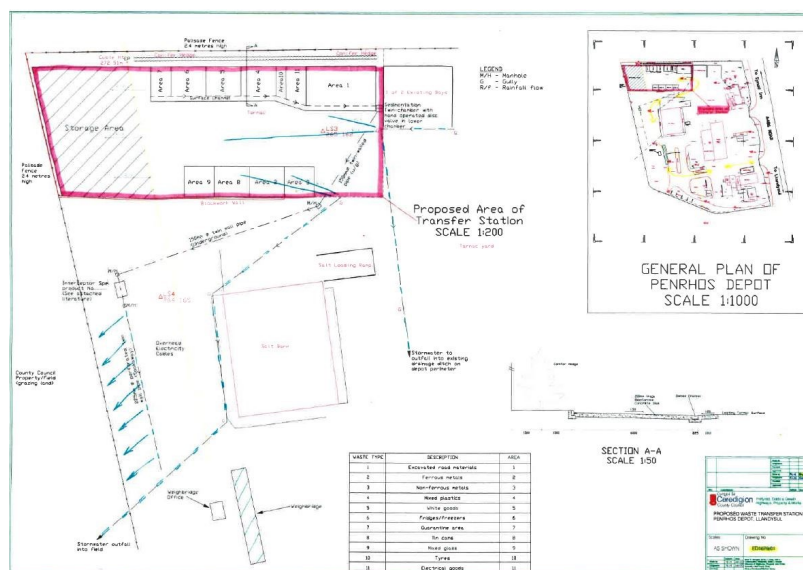
### 4. Details of our assessment

A routine unannounced site inspection was undertaken by Natural Resources Wales officer Ffion Quan (Waste Regulation Officer) accompanied by Kim Jones (Hazardous Waste Officer). Officers on site were met by Gary Griffiths, the highways operations manager.

The weather throughout the visit was dull and damp.

#### General Observations:

According to the plan in Schedule 1 of the site's environmental permit, the whole highways depot is permitted but the waste operations are limited to an external waste transfer station area which is located to the right-hand side of the site. The waste transfer area is highlighted in the below drawing ED1679/01.



The site was generally clean and tidy throughout with waste kept in designated bays or containers. The highways sweepings and salt were stored within designated sheds. See photographs below.



The overall drainage systems of the site are good. Drainage from the Waste Transfer area of the Depot goes to containment tanks, with a reception tank that can be closed if anything

contaminated is spilt on the yard. The drain from the fuel area goes to the foul sewer. See photograph below.



#### Site identification board

As noted on previous CAR\_NRW0035268, following the site visit on 15 May 2019, your site identification board was out of date. Subsequent to this action, you arranged for a new ID board. The sign appeared to contain all necessary information and located in the appropriate location, near the main entrance gate, as seen in the photograph below.



#### Other issues:

Whilst walking around the site, officers noticed a pile of domestic bulky waste including but not limited to sofa, mattresses, and a wooden table. See photograph below.



As noted in your working plan, all discharge, sorting and loading of wastes will be carried out in pre designated bays as detailed on Drawing ED1679/01 and the waste will be visually inspected to ensure compliance with the licence. EWC code 20 03 07 Bulky Waste is not a permitted waste type at your facility and therefore the waste should be directed to the quarantine area 7 as seen on drawing ED1679/01.

**Action – Please ensure that the waste stored in this area is moved to the quarantine area 7 where the competent person can review the non-conformance and define the action necessary to at least eliminate the possibility of recurrence by 10/12/2021.**

Please also ensure as per permit condition 2.1.1 Table 2.1 that your drain / manhole covers are colour coded on site: blue for surface water and red for foul drainage. It was noted on site that the foul drainage drain was colour coded red but could not be clearly seen. To be done at the earliest opportunity.

Thank you for your time.

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 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](mailto: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](mailto: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.