

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

Site	Cae Bwsan	Permit Ref	YP3294FG		
Operator/Permit holder	Paul Allport				
Regime	Waste Operations				
Date of assessment	20/08/2019	Time in	09:50	Out	10:45
Assessment type	Site Inspection				
Parts of the permit assessed	The CAR Subcriteria listed below				
Lead officer's name	Briscoe, Ross				
Accompanied by	Hughes, Julie				
Recipient's name/position	Paul Allport/ TCM	Date issued	04/09/2019		

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	C3	1.1.1 (a)
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.1.2
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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	2	Total compliance score (see section 5 for scoring scheme)	8
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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

This unannounced site inspection was carried out on Tuesday 20th August 2019 by Natural Resources Wales officers Ross Briscoe (Senior Officer Industry & Waste Regulation) and Julie Hughes (Tackling Waste Crime officer).

Present was the permit holder Paul Allport and Eirian Allport.

Weather conditions throughout the visit were dry and sunny. The site was open with wastes being deposited at the site and minor sorting and segregation taking place.

Officers were accompanied throughout the inspection by Paul Allport. Officers were shown the vehicle depollution area and advised of the changes being made on site to relocate the depollution facility to a new shed which is to be constructed.

Due to the construction taking place, wastes were stored not in accordance within the site plan however this was understandable given the work taking place. Officers advised that a new site plan should be drafted once the work on site was finished. This should include the storage location of wastes and other notable features (site drainage, spill kits, quarantine areas).

Concreting had also taken place within the central area of the site where the previous concrete surface had worn away due to heavy plant movements.

ELV's and scrap metal was being stored on site, the quantities appeared within the permitted limits.

A new site identification board at the site entrance had replaced the previous board which had become faded due to sunlight exposure.

Within the site office, officers were shown waste transfer documentation for waste leaving the site. This consisted of waste transfer notes and hazardous waste consignment notes.

Site inspection checklists are completed with documentation stored in the office.

Officers advised that as the site Environment Management System is now 4 years old a review should be undertaken to ensure it is up to date and reflects operations taking place on site. Once this review has been undertaken, please forward a copy of the document to the site regulating officer.

Both Paul and Eirian Allport have valid COTCs.

Waste return documentation for the previous 2 quarters of 2019 (Jan - Mar, April - June) were reviewed and found to contain no issues.

The following non-compliances were noted upon the inspection.

A1 – Specified by permit, Permit Condition 1.1.1 (a), Compliance Classification Scheme Category 3 breach.

Waste material (Engines and alloys) were observed to be stored outside of the permitted area. All waste material is

required to be stored within the permitted area. Please ensure that the identified waste material is brought back within the permitted area. In addition, items of waste material were observed to have fallen over the permit boundary behind the shear/bailing machine – please ensure these items are retrieved. A category 3 non-compliance has been recorded for this non-compliance. Should you wish to increase the size of your permitted area, this can be completed via a variation to your current environmental permit. At present there is no charge for a variation to increase the size of your permitted area however this may be subject to change. All of the application forms including associated guidance documents can be found upon our website www.naturalresourceswales.gov.uk on the waste permitting webpages.

B1 – Engineering for prevention & control of emissions, Permit Condition 2.1.2, Compliance Classification Scheme Category 3 breach.

The area of the site along the rear of the shear/bailing machine does not benefit from sealed drainage. Presently the site surface does not have a kerbing meaning that any fluid or emission from site can flow directly onto neighbouring land (Open fields). Table 2.1 of the site permit specifies the standards which are required. Please ensure that the necessary works are carried out in order to remove this risk and ensure compliance with the permit. A category 3 non-compliance has been recorded for this non-compliance.

To summarise the following non-compliances have been recorded.

A1 – Category 3 breach – 4 CCS points

B1 – Category 3 breach – 4 CCS points

Total number of CCS points recorded for site inspection on 15 August 2019 – 8.

Total number of CCS points for the 2019 compliance year so far is 8. This places you within compliance band B.

Please keep the regulating officer aware of progress with regards to the identified non-compliances.

Thank you for your time.

Regards,

Ross Briscoe (Senior Officer, Industry & Waste Regulation North West)

ross.briscoe@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 2012.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035649**

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Site	Cae Bwsan	Permit Ref	YP3294FG
Operator/Permit holder	Paul Allport	Date	20/08/2019

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
A1	C3	All waste material to be stored within the designated permitted area.	31/10/2019
B1	C3	Ensure that site surfaces meet requirements of table 2.1. In particular that site surfaces are impermeable and sealed in accordance with sections b and c of table 2.1 within the area to the rear of the shear/baler.	31/10/2019

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.