

Compliance Assessment Report

Report ID:
CAR_NRW0034206

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

Site	Bessemer Close Transfer Station	Permit Ref	VP3199FC			
Operator/Permit holder	Biffa Waste Services Ltd					
Regime	Waste Operations					
Date of assessment	08/11/2018	Time in	10:00	Out	11:00	
Assessment type	Audit					
Parts of the permit assessed	All					
Lead officer's name	Taylor, Richard					
Accompanied by	Coleman, Craig					
Recipient's name/position	Simon Milford/ Site Manager	Date issued	08/11/2018			

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
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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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Biffa Transfer Station

Bessemer Close – Permit VP3199FC

NRW carried out an unannounced inspection to the permitted site between 10.00 and 11.00 hrs on 8th Nov 2018.

Officer attending – Richard Taylor (NRW); Craig Coleman (NRW).

The areas of concern from the site were judged to be; drainage, noise, odour, pests/scavengers, capacity of storage, risk of fires, and waste acceptance/accountancy. All were checked at the site visit and found to meet the permit conditions.

Areas of concern (without permit breach);

- 1. Site were using holed skips (metal skips containing holes therefore non-waterproof). This was seen as a potential problem if they were used for powdered or leachable wastes. However, in this case, the skips were labelled and were being used to hold large bulkier items such as wood and metal as dedicated skips. This was acceptable as long as they are not used on other waste streams. Labels were present on these skips. An improvement would be to renew the skips or to additionally paint the waste type onto them in bold letters.**
- 2. The capacity of the site was seen to be reaching the permitted 30 tonnes capacity. This was due to a temporary excess of medical waste (purple/pink bags) in the area due to a site closure elsewhere in the chain. Site to ensure that the permit limits are not breached and inform NRW if they do so.**

Summary of findings

1. Drainage	Site is equipped with sealed drainage. No issues witnessed. No blockages or Oil/leachate runoff seen.
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2. Noise	Site had one mover operating on site which was equipped with a white noise reversing bleeper. Nearest domestic residents were seen as being too far away to be effected as noise was controlled effectively on site. As such, site operating hours of 5.30am – 15.30 pm were not seen as being as prominent an issue as it would have been had the residents been situated adjacent. Site controls the drop heights from the loader. This was not witnessed on the day but needs to be managed proactively to reduce noise impact to site staff as well as local businesses.
3. Vermin	Rat boxes are positioned around the compound and appeared to be well maintained.
4. Odour	There was odour witnessed in the vicinity of the food hall. This was not great enough to be witnessed off site. Control measures were seen to be in place. Stockpile quantities are kept within permit limits. Roller shutter doors are closed. However, at the time of the inspection, these were open for the daily hose down with fresh water which was occurring. The roller shutter doors were reported to be only open at the time to enable the cleaning to take place.
5. Birds	Some bird presence. 2 crows were seen pecking at the covered clinical waste. This should be managed to ensure that bird presence is minimised. Site reported a falconer is employed on site periodically. This was seen as an acceptable control measure to minimise bird presence.
6. Storage Capacity	Site were carrying more clinical waste than usual due to problems in the waste chain elsewhere. This had the effect of raising the amount held on site to near the 30 tonnes/day daily limit. Site need to manage this to ensure this is held under 30 tonnes and report to NRW if this overtops the maximums permitted capacity.
7. Risk of fires	Storage also increases the risk of fires from site. However, the site was seen to be holding an estimated 4 days' worth of waste. Fire risk is minimised by the fast turnover of waste material. As such the fire risk is minimised. Evidence of a fire which took place approximately 18 months ago was seen. Biffa have plans to modernise the building and bring forward the current infrastructure. Firefighting equipment was seen to be present in the working areas.
8. Waste acceptance /accountancy	The EWC codes for the site waste acceptance were asked for and provided by site staff. The accountancy for incoming and outgoing wastes was checked and found to be in good order without any noticeable concerns. The system of accountancy in place was seen to be working well and thorough. All waste was seen to be separated into individual streams.

End

EPR Compliance Assessment Report

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Operator/Permit holder	Biffa Waste Services Ltd	Date	08/11/2018

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			

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.