

Compliance Assessment Report

Report ID:
CAR_NRW0032612

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

Site	Trecatti Landfill NRW/EPR/RP3733PC/V008	Permit Ref	RP3733PC			
Operator/Permit holder	Biffa Waste Services Ltd					
Regime	Installations					
Date of assessment	12/12/2017	Time in	10:00	Out	15:00	
Assessment type	Audit					
Parts of the permit assessed	Waste acceptance criteria					
Lead officer's name	Taylor, Richard					
Accompanied by						
Recipient's name/position	Simon Milford/ Site Manager	Date issued	15/12/2017			

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 – Trecatti Landfill site – permit RP3733PC

Site Inspection – 12th Dec 2017

Present – Simon Milford – Site manager; Hannah Clifford – Biffa Regional Environmental Manager (North); Richard Taylor – NRW Site Inspector

1. Purpose of Inspection – The Site Inspector continued familiarisation of the site and chose to look at the waste acceptance criteria as well as carrying out an audit on a particular waste stream which originated from another site. This secondary audit was to ascertain the cradle to grave disposal of RDF material and to ensure all aspects of disposal were accounted for.
2. Calibration of site weighbridge – A current certificate was provided which showed the weighbridge was calibrated by specialist external company 'Precia Molen' on 31st July 2017 – certificate number TR10200.
3. Waste Acceptance criteria – Biffa is permitted to accept non-hazardous waste and asbestos at this site. The divisional guidance document was shown. This was last updated 27th Apr 2017.

Biffa has a policy where no waste is allowed on site without prior notification. Contentious waste intended for filling goes through an assessment through the technical waste team based in Wednesbury prior to it being allowed to be transported to site. Samples of the material are sent for analysis to an independent lab. Waste arriving at the weighbridge is scheduled into a programme and carries the correct waste transfer notes. Also, Biffa carry out a vetting procedure on their customers to ensure quality is maintained.

10% of the material is checked on arrival for 'loss on ignition' in a dedicated area. A 20gramme sample is taken and sent to the lab where the results are provided after approximately 7 days.

Site meets the ticketing requirements (waste transfer notes) laid down in the permit for;
Records of waste quantity – waste characteristics – date of delivery – Identity of the waste producer – and origin of the waste.

The Biffa group has a working document on all waste acceptance criteria. This was shown at the inspection. The 'Pre-acceptance and work procedures' (DPL/04 V1 Feb 2013) is a detailed guidance document aimed at best practice procedures to be employed throughout the group. It is updated regularly within the Biffa organisation to ensure it remains current.

4. Weighbridge – The weighbridge was visited and 2 loads were observed to enter the site. The paperwork procedure was followed as laid out in Biffa's procedures. Overhead camera's look into the back of the waste trucks parked on the weighbridge. The weighbridge operator can reject loads which do not meet the required standard. Records showed the last rejected load was on 1st Dec 2017 which was rejected on the basis of it being liquid waste which is not permitted.

5. Site tour - On this occasion, there was snow on the ground and visibility was down to a few metres. This negated any possibility of seeing the tipping face and made driving on the site potentially hazardous. The site tour was not pursued further than the weighbridge.
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6. Induction procedure – For the record, the site inspector was taken through Biffa's site specific induction procedure. This consisted of a film plus a written test. The film did not cover DSEAR regulations directly, but this was indirectly included with the requirements to adhere to signage around the site.
7. RDF waste audit - Waste records correlated to those of the originator. The running totals were seen to be approximately 3% lighter on site than where they originated from. This could be down to several factors including fuel use to site, weight of driver, calibrated weighbridge differences, water loss etc. **Large differences in individual weights will be investigated further. These will be where the originators weight is greater than 1 tonne different from the arrival on site weight.**

NRW will accept 3% difference in these shipments. What is more important is that each load is accounted for and that each load is within approx. 3% difference.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	Biffa Waste Services Ltd	Date	12/12/2017

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.