

Compliance Assessment Report

Report ID:
CAR_NRW0033573

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

Site	C A D Recycling Ltd	Permit Ref	AB3894FE			
Operator/Permit holder	C A D Recycling Limited					
Regime	Waste Operations					
Date of assessment	26/06/2018	Time in	11:35	Out	12:48	
Assessment type	Site Inspection					
Parts of the permit assessed	See below					
Lead officer's name	Challender, Paul					
Accompanied by	White, Steven					
Recipient's name/position	Tony Sykes/ Operator	Date issued	04/07/2018			

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E3 - Emissions - Surface water	A	
E4 - Emissions - Sewer	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	
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	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

This was the first site inspection since the site had become permitted with an Environmental Permitting Regulations 2016 waste operation permit by Natural Resources Wales (NRW) by the assigned Environment Officer (EO) Paul Challender who was accompanied by EO Steven White. This was an unannounced inspection and at the time of the inspection the weather was hot, dry and still. The officers were accompanied for the duration of the visit by Mr Tony Sykes and Mr David Driver.

CAD Recycling Ltd have been operating permitted waste sites in the Denbighshire area and have been operating under exemptions at the newly permitted location for many years. The site was primarily a mattress recycling operation with some ancillary activities such as the receipt of domestic refrigeration units for bulking and onward transfer. The site now benefits from a Standard Rules Permit which permits the rule set SR2008 No3. As such the site now only has an S2 exemption registered.

During the inspection the issue of how waste exemptions can adversely affect the permit conditions of the issued Standard Rules waste permit was discussed. The S2 exemption has been maintained to allow the continued receipt, bulking and transfer of domestic refrigeration units. The operator is aware that this operation needs to be kept discrete from activities conducted under the waste permit conditions and that items accepted under the exemption need to be collected/received and stored separately from waste streams managed under the permit conditions. Furthermore, waste streams managed under the S2 exemption should not occur on the Waste Returns for the site. Although it should be noted that, a clear document trail should be maintained and the transfers of S2 exemption waste streams needs to be supported by Waste Transfer Notes (WTNs) which will be stored so as to be available for inspection. This will enable you to comply with your Duty of Care obligations. If you wish to bring all waste activities under the umbrella of a single waste permit you will have to apply to vary your current permit to a bespoke permit; advice can be sought from your regulating officer if you decide that this is an avenue that you wish to explore.

The waste transfer building was inspected. The building is currently not being utilised as a transfer building as the bulk of waste operations at present is the recycling of mattresses which is still proceeding in the original buildings. Some small-scale storage of post treatment mattress components is taking place in the interim. As such, the impermeable surface, its fall and the layout of the drainage system was easily assessed and could be cross reference against the drainage plans for the site.



Mr Sykes outlined his ongoing intentions for the access road and site fencing was discussed. Previously the site had been the victim of an arson attack. The operator has implemented improved fencing and, fire security and suppression systems and intends to improve further to reduce this risk.

The operator is currently utilising a third party Technically Competent Manager (TCM) until staff employed by CAD Recycling Ltd have completed the necessary course/s to enhance or gain an initial TCM qualification.

You are reminded that you are required to submit quarterly Waste Returns for your permitted activities. As you have now brought the mattress operation under the permit I expect to see Waste Returns for the site during the next submission for Quarter 2 - April 2018 to June 2018 which are required to be submitted by the 31st July 2018.

Thank you for your time during this inspection.

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

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Site	C A D Recycling Ltd	Permit Ref	AB3894FE
Operator/Permit holder	C A D Recycling Limited	Date	26/06/2018

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.

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.