

Compliance Assessment Report

Report ID:
CAR_NRW0035726

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

Site	A S H Bretton Recycling Centre	Permit Ref	VP3794FN			
Operator/Permit holder	Alan's Skip Hire Limited					
Regime	Waste Operations					
Date of assessment	16/09/2019	Time in	14:50	Out	15:30	
Assessment type	Site Inspection					
Parts of the permit assessed	Specified by permit;Containm,ent of stored materials; Plant and equipment; Management system and operating procedures; Materials acceptance; Storage, handling, labelling and segregation; Odour; Dust, fibres; particulates and litter					
Lead officer's name	White, Steven					
Accompanied by	Henderson, Amy					
Recipient's name/position	Steve Rymill/Neil Hassel/ Compliance Manager/Director	Date issued	01/10/2019			

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	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F1 - Amenity - Odour	X	
F3 - Amenity - Dust/fibres/particulates and litter	X	
	X	
F5 - Amenity - Deposits on road	X	

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 an unannounced inspection carried out by Regulating Officers Steven White and Amy Henderson, we were accompanied throughout by Tim Bailey (Sr). The weather was sunny, dry and a intermittent breeze was blowing from the direction of Airbus.

Just prior to the inspection NRW received a report of odour allegedly originating from ASH Bretton, on arrival we stopped outside the permitted area to see if we could detect any odour; there were faint smells of waste detected intermittently on the breeze off site but this was not deemed offensive enough to warrant a score against the permit.

Action: You must ensure that odours from site are dealt with according to section 4.5 of the site EMS.

The area of the yard that was previously 'Chadwicks' was checked, this area is not part of the permitted site but has a T4 exemption for the baling and sorting of paper waste registered. At the time of the visit this area was not in use; when the operations start in this area you must ensure that the conditions set out in the exemption are adhered to, failure to do so would be an offence. If you find that you cannot adhere to the conditions of the exemption you must stop the activities immediately and consider applying for a variation of the site permit to include this area in the permitted boundary.



Exempt area

The picking line was not operational in the main shed at the time of the inspection, Tim explained that a bearing on the trommel had broken and was due to be fixed imminently, the main grabber was also not operational at this time; as such the waste brought onto site was being sorted by hand. Whilst we were in the immediate vicinity of the main shed we were able to detect a strong odour from the waste pile - this was mainly contained within the building and immediate area, however, occasional strong gusts did cause odour to be detected elsewhere in both the yard and outside.



Main sorting shed with manual sorting of waste

As the main sorting liner was out-of-action there were no trommel fines being produced, subsequently these were being put through the Bluemac fines machine which was operational at the time of the visit. No dust was observed coming from the machine, however the wind around the yard could easily have dispersed the dust quickly. During the inspection officers were able to detect a dustiness to the air and occasional grittiness in their teeth, on inspection of some cars outside of the permitted boundary there was evidence of a fine dust coating them; some of which had only been outside for a couple of hours. The mist-spray system at the site entrance was not in operation at the time of the visit, however a water bowser had been around the yard to dampen down some of the dust created by the vehicle movements, site operations and wind conditions (see photo below). Investigations are ongoing as officers were unable to definitively pinpoint the source of the dust, if dust is observed coming from machinery/equipment/wagon movements from the ASH yard you must adhere to condition 4.4 of the site EMS with regards to dust.

Action: In addition to the litter condition set out in the EMS (section 4.6), in conditions of high winds you must also ensure that any litter blown off site is recovered and the litter-pick is noted in the site diary.



Bluemac fines machine and wet ground from bowser

Action: If dust produced from site operations/wagon movements is thought to be having an effect off site you must adhere to the relevant EMS procedures (Section 4.4).

Thank you for your time during the inspection, please find my contact details below.

Regards

Steven White

Senior Environment Officer (Waste Regulation Team)

EPR Compliance Assessment Report

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Operator/Permit holder	Alan's Skip Hire Limited	Date	16/09/2019

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.

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			
F5	X	Dust from wagons entering/exiting site must be dealt with as per EMS condition 4.4	10/10/2019
F3	X	In windy conditions you must ensure that litter blown off site is recovered and on-site litter is dealt with as per EMS condition 4.6	10/10/2019
F3	X	Dust (and potential dust arisings) must be dealt with as per EMS condition 4.4	10/10/2019
F1	X	Odourous wastes and odours from site must be dealt with as per EMS condition 4.5	10/10/2019

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.