

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

Site	Briton Ferry Household Waste Recycling Centre			Permit Ref	34267		
Operator/ Permit holder	F C C Waste Services (U K) Limited						
Date	23/09/2015			Time in	11:10	Out	11:50
What parts of the permit were assessed	Permitted area						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Alwyn Spedding - Technically Competent Manager						
Officer's name	Gareth M Davies, Jodie Medcraft			Date issued	10/11/2015		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	NA	
	4. Containment of stored materials	A	
	5. Plant and equipment	NA	
c) General management	1. Staff competency/ training	NA	
	2. Management system & operating procedures	NA	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	C3	Condition 4.6.1 and Table 4.6
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	NA	
	2. Land & Groundwater	NA	
	3. Surface water	NA	
	4. Sewer	NA	
	5. Waste	NA	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	NA	
	2. Energy	NA	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Present

Gareth Davies – Natural Resources Wales

Jodie Medcraft – Natural Resources Wales

FCC Site Supervisor

The purpose of the inspection was to assess the current compliance of FCC Wales Services (UK) Limited's compliance with their environmental permit EPR/FB3539AZ.

A site tour was carried out with one of the site supervisors on site. During the site tour a number of observations were made regarding the waste storage practices on site. Following a further review of the environmental permit EPR/FB3539AZ the following comments have been made.

Waste Storage

A battery box was being stored in the Local Authority yard area. The batteries were being stored over the capacity of the battery box with a lid. This can be seen in the picture below. There is the potential for a small amounts of rainwater ingress to occur. Condition 4.6.1 and table 4.6 e) c) states that containers shall not be filled beyond their operational capacity.

The area for the storage and deposit of waste oils had oil containers stored outside of the bunded tank and oil containers were being stored in excess of the capacity of the storage drum. This can be seen in the photograph below. Condition 4.6.1 and Table 4.6 i) a) states that oils should be stored within a secure container located upon an impermeable pavement at a location agreed in writing with the Agency.



The above breaches of Condition 4.6.1 and Table 4.6 have been scored a C3 under C4 Storage, Handling, Labelling and Segregation. Please ensure that all Waste Refrigeration, Lead Acid Batteries and Waste Oils are stored in accordance with Condition 4.6.1 and Table 4.6 e) and i) respectively.

Waste Types

There was a large volume of mattresses stored on site. This can be seen in the photograph below. This was due to an initial loss of outlet. The volume of mattresses on site should be managed to ensure that a large stockpile of mattresses occurs. A new contract was in place and the number of mattresses will be reduced on site.

There were a number of battery boxes containing paint tins stored on site. None of these had lids on top. It is recommended that lids are placed on the battery boxes once the containers are full. This will prevent the ingress of rainwater from entering the containers.

There were a number of wheelie bins stored on site containing plasterboard. None of the wheelie bins had lids closed on them despite them being full of plasterboard. It is recommended that once a wheelie bin has been filled with plasterboard a lid is placed on top to ensure that rainwater is prevented from entering.



END

	EPR Compliance Assessment Report	Report ID: 34267/0250789
This form will report compliance with your permit as determined by an NRW officer		
Site	Briton Ferry Household Waste Recycling Centre	Permit 34267
Operator/ Permit	F C C Waste Services (U K) Limited	Date 23/09/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			X
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.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C4	C3	Please ensure that all waste types and stored in accordance with Table 4.6	01/12/2015

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 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 which 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 fulfill 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.