

Compliance Assessment Report

Report ID:
CAR_NRW0031497

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

Site	Cymmer Household Waste Recycling Centre	Permit Ref	FB3539DV			
Operator/Permit holder	F C C Waste Services (U K) Limited					
Regime	Waste Operations					
Date of assessment	04/04/2017	Time in	11:55	Out	12:25	
Assessment type	Audit					
Parts of the permit assessed	Permitted Area					
Lead officer's name	Medcraft, Jodie					
Accompanied by						
Recipient's name/position	Darren Hemming/ Technically Competent Manager	Date issued	11/04/2017			

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

Present

Jodie Medcraft – Natural Resources Wales

Darren Hemming – FCC Wales Services (UK) Limited

A tour of the site was carried out with Darren Hemming, the new Technically Competent Manager (TCM) for the site.

The purpose of the inspection was to assess the current compliance of FCC Wales Services (UK) Limited with their Environmental Permit EPR/FB3539DV and the actions placed on them during the last inspection (06/09/16 CAR_NRW0026442) as detailed 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			
C2	C3	Ensure that activities on site are being undertaken as described in the working plan.	16/12/2016
B4	C3	Ensure that adequate storage facilities are provided for these wastes pending their removal from site.	16/12/2016
C4	C3	Ensure that all waste oils are stored in accordance with this condition.	16/12/2016
D1	C3	Ensure all damaged areas of fencing are repaired or additional security measures are put in place to ensure no unauthorised access to the site.	16/12/2016

Action 1 – Ensure that activities on site are being undertaken as described in the working plan.

During the previous inspection it was noted that there were a number of discrepancies between the working plan on site and the current operations on site, namely;

Hours of operation in the working plan not matching the actual operational hours.

Response to action – The site working plan has been updated to reflect the correct operational hours on site.

Daily checks of drains and gullies not being undertaken resulting in blocked drains and standing leachate water being observed as a major problem on site.

Response to action – Site staff have been spoken to about the condition of the drains and explained the

importance of keeping the drainage system clear. Daily inspections of drains and regular cleaning has been put in place to prevent reoccurrence.

Gas canisters being stored incorrectly in broken, unlocked metal compounds.

Response to action – Gas and LPG canisters have been moved into a secure lockable compound and the broken compound repaired.

Plasterboard being stored incorrectly as inert waste and inadequate storage facilities provided for plasterboard.

Response to action – Plasterboard was being stored incorrectly as a result of the plasterboard bins being full. The dedicated containers for plasterboard have since been moved into one of the sheds providing cover from rainwater. Sufficient numbers of plasterboard containers have been supplied and increased collections are in place to prevent reoccurrence.

Staff on site did not have access to an up to date copy of the working plan.

Response to action – At the time of the previous visit the working plan was being kept at the Britton Ferry office whilst it was in the process of being updated. This has since been updated in full and a copy is now available in the site office at the Cymmer HWRC.

I am satisfied that Action 1 has been fully complied with.

Action 2 – Ensure that adequate storage facilities are provided for wastes pending their removal from site.

During the previous visit there was a large volume of mattresses, sofas and chairs being stored on site, along with an excess of general household waste. These wastes were not being stored in a suitable container.

Response to action – The amount of waste being stored on site and outside of suitable containment was due to a lack of drivers. Since the inspection measures have been taken to ensure that sufficient numbers of bins are provided and that they are emptied on a regular basis. Regularly scheduled van collections have been arranged and strict instructions have been put in place so that when approaching 75% capacity, a member of the supervisory team is notified to ensure collection is arranged in plenty of time.

I am satisfied that Action 2 has been fully complied with.

Action 3 – Ensure that all waste oils are stored in accordance with the permit conditions.

During the previous visit the area for the storage and deposit of waste oils had containers being stored outside of the bunded tank and oil containers were being stored in excess of the capacity of the storage drum.

Response to action – Use oil containers are no longer allowed to be left to “drip dry” on top of the oil tank. Used oil containers are being put into a separate impermeable container to be disposed of appropriately.

I am satisfied that Action 3 has been fully complied with.

Action 4 – Ensure all damaged areas of fencing are repaired or additional security measures are put in place to ensure no unauthorised access to the site.

During the previous site it was highlighted that there were frequent break-ins to the site which it had resulted in large areas of the steel palisade fencing which borders the site being damaged. The posed a huge risk of arson and theft on site.

Response to action – Site security has been raised with the council. Damaged fencing has been welded to prevent further break-ins.

I am satisfied that Action 4 has been fully complied with.

Additional Notes

It was clear to see that a lot of work had been undertaken on site in order to bring the site back into compliance. It was very pleasing to see the improvements that had been made.

During the inspection it was noted that all skips and storage units being used appeared to be structurally sound and contained no rogue wastes. The Environment Management System for the site had been updated and was readily available in the site office.



Many thanks for your time during the inspection.

EPR Compliance Assessment Report

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Site	Cymmer Household Waste Recycling Centre	Permit Ref	FB3539DV
Operator/Permit holder	F C C Waste Services (U K) Limited	Date	04/04/2017

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.

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.