

Compliance Assessment Report

Report ID:
CAR_NRW0032320

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

Site	Nantycaws H C I Transfer & Treatment Facility	Permit Ref	EP3698FL			
Operator/Permit holder	CWM Environmental Ltd					
Regime	Waste Operations					
Date of assessment	17/10/2017	Time in	11:30	Out	14:05	
Assessment type	Audit					
Parts of the permit assessed	See Below					
Lead officer's name	Bacon-Weekes, Liane					
Accompanied by	Edwards, Michael					
Recipient's name/position	David Morris/ TCM	Date issued	06/11/2017			

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
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	
C4 - General Management - Storage, handling labelling and Segregation	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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

Announced site inspection undertaken by Liane Bacon-Weekes and Michael Edwards of NRW, accompanied on site by David Morris and David Baldwin.

IVC

Infrastructure of facility was found to be in good condition, good impermeable pads with sealed drainage with raised concrete lips around exposed side of the IVC's despatch and transfer area to capture any runoff in the sealed drainage system.

No waste was stored outside of permitted area, with green waste stored on the concrete surface with drainage channels surrounding it in line with permit **conditions 2.1.1 and 2.2.1**. Food waste was stored within the shed for the composting process as per the submitted EMS. Drainage within the reception building was kept clear of waste with no signs of pooling effluents.

At the rear of the IVC there was evidence of a spillage from the drainage system. The impact seemed localised, however, it is important that you record these incidents/accidents, undertake an incident review and follow any necessary steps and perform all remedial actions to ensure there are no impacts to the environment and update the management system to ensure the incidents do not reoccur.

Please note that this will be reviewed in the next inspection.



The tank at the rear of the facility was bunded there seemed to be some grey water within this bund. Please ensure that all infrastructure is properly maintained (including bio filter), and records kept for all works undertaken, including servicing, repairs etc.

The stream at the rear of the facility was clear, with no obvious signs of pollution. Some odour present during the inspection

however we were unable to determine the source. Ensure that you continue monitor the stream as per **condition 3.3.1 (d)** of the environmental permit keeping all records of this.

Civic Amenity Site

The CA site in general had good segregation of waste, with separate collection skips and bins for waste types. However it is noted that in the storage area for paints, there was a container labelled Sodium Hypochlorite, with liquid inside. Sodium Hypochlorite can be given the waste code **06 02 05*** (depending on its use). As discussed on site it is important that staff are aware of the dangers of these chemicals and ensure that in future they are stored in a quarantined zone, this should be reflected in the EMS. Furthermore it is important to note that the consignment notes used for chemicals such as these are completed with the most appropriate EWC code.



Inspection of the fridges stored within container on site found no mechanical or physical treatment, in line with activities listed in **Schedule 1** of the permit.

Street Sweepings, Open Windrow and Aggregates

No issues were identified with the storage of the unprocessed street sweepings, all waste being stored on an impermeable base with sealed drainage within the boundary of the permit. The process for the recovery of street sweepings follows the methods outlined in the non technical summary document provided to NRW in line with condition.

The open windrows composting process was held on an impermeable surface. With drainage into the nearby lagoon. no issues were identified for the storage of the compost on the hard standing at the top of the site. As discussed on site use of machinery allows the windrows to be turned so that the operation is maintained as an aerobic process.

Aggregates were stored in accordance with the site EMS. On inspection no issues were identified. Again, all wastes were stored within the marked boundary, under **condition 2.2.1** of the permit.

Record Keeping

It was encouraging to see that the monitoring required under permit **condition 3.3.1** was being undertaken and records were updated on a daily basis. As suggested during the inspection, it could be beneficial to alter the recording sheet currently used to mirror the tables in **Schedule 3** of the permit.

It was also highlighted during the inspection that under **condition 3.1.4**, you will be required to undertake groundwater sampling at least once every **5 years**, and soil sampling at least once every **10 years**, as discussed on site, this would be from the date the

current permit was issued (**June 2015**).

It was good to see that all paperwork required to be on site was easily accessed in line with **conditions 1.1.1** and **1.1.3**. It was also confirmed during the inspection that David Morris has retained his WAMITAB certification of competency as per **condition 1.1.4** of the permit.

Evidence of compliance with PAS100 was kept with records within office, inspection audit from 2016 was reviewed with no issues identified that would not allow the compost produced on site to meet the end of waste criteria as set out in PAS 100 guidance and Quality Protocol.

Consignment notes reviewed for some highlighted hazardous waste types, including **200123***, **170605***, **160601***, **200133***, **130205***, **200121***, **200135*** and **200127***. No issues were identified with the consignment notes that were provided.

Many thanks for your time during the inspection.

EPR Compliance Assessment Report

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Operator/Permit holder	CWM Environmental Ltd	Date	17/10/2017

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.