

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

Site	T J's Skip Hire Ltd		Permit Ref	103384		
Operator/ Permit holder	T J's Skip Hire Ltd					
Date	06/07/2015		Time in	10:30	Out	11:15
What parts of the permit were assessed	All Below					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Brendan Furness					
Officer's name	Rhys Ellis		Date issued	09/07/2015		

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)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	C3	1.1.1*
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
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.

Environment Officer met with Brendan Furness (Site operator) and Martin Womack (Environmental Consultant). Weather during the visit was wet.

C4 – Storage, Handling, Labelling and segregation.

The purpose of today's visit was to discuss the unprocessed mixed waste stored at the rear of the building on site and the operators progress in complying with the Notice served on TJ Skip Hire Ltd on the 20th March 2015. The notice stipulates that you must treat and remove from site all unprocessed mixed waste stored at the rear of the building by **10:00** on the **27th August 2015**.

A target was set by the operator during the last visit. It was suggested that by end of this month he will aim to treat and remove from site a block section leading right to the back of the hanger. This section is located near the trommel. This section still remains un cleared and it was explained by Mr Furness that he has had staffing issues and is finding it difficult to remove waste off site.

Concerns were raised during the visit that the volume of waste stored at the rear of the hangar does not appear to have reduced a great deal since my previous visits on the 10th June 2015. For information I have attached photos taken today and photos taken during my last visit to site on the 20th June 2015 to compare.

Please note that failure to comply with an enforcement notice is an offence and will lead to further enforcement action.

It was agreed on site that I would be visiting the site on 31st July 2015 to assess progress. In the mean time you will reply formally to Natural Resources Wales no later than 17th July 2015, providing in detail what actions will be taken during the remaining time of the notice period, which expires at 10:00 on the 27th August 2015. It was also suggested that an explanation to the reasoning for the little progress to date would be useful.

As the operator is not operating the site in accordance with the environmental management system due to the amount of time that the mixed waste has been stored on site, a breach of condition 1.1.1 of the permit is noted, scored as a category 3 under sub criteria C4. Due to the fact that a notice has been served regarding this matter – the score is currently suspended.

PLEASE NOTE: It is important to note that the site must ensure that incoming mixed waste is kept separate from the existing stockpile described above.

CODE B ref 0014 was issued to the operator during the visit.

Other observations

Mr Furness took environment officer around to an area outside the building (left hand side). It was evident that substantial amount of waste material (mainly soil with some minor contamination i.e. plastic etc) has been removed off site. This area looked much tidier. Please ensure that remaining material is removed as soon as possible and that in future you keep the levels of stored mixed and soil material within a manageable level. Please also forward copies of waste transfer notes for this material.

Please note that permit condition 2.3.1 stipulates that unless stored or treated as specified waste, all bulking, transfer or treatment of waste shall be carried out inside a building and all waste shall be stored in a building or within a secure container.

This condition would also applies to the skips containing waste stored outside the building.

The previously constructed inert bay within the building appeared full and it was explained to officer that the site was experiencing problems in finding outlets for the material.

There was a substantial pile of both residual and carpet waste on site

Photographs comparing today's visit with the visit back on the 10th June 2015.



10th June 2015

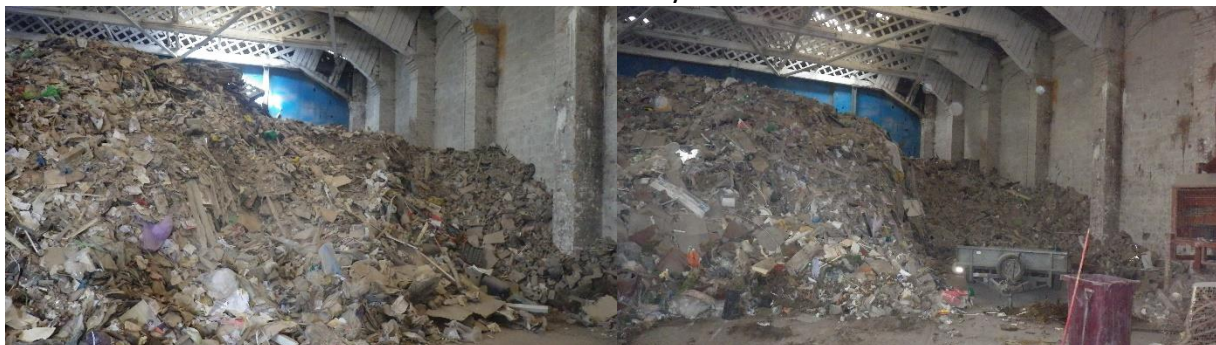


6th July 2015



10th June 2015

6th July 2015



Substantial amount of soil removed off site.

Natural Resources Wales' means the Natural Resources Body for Wales established in Article 3 of the Natural Resources Body for Wales (Establishment) order 2012

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Operator/ Permit	T J's Skip Hire Ltd	Date	06/07/2015

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.	
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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.	X
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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	<p>The notice stipulates that you must treat and remove from site all unprocessed mixed waste stored at the rear of the building by 10:00 on the 27th August 2015.</p> <p>Site to provide details of what actions will be taken during the remaining time of the notice which expires at 10:00 on the 27th August 2015. It was also suggested that an explanation to the reasoning for the little progress to date would be useful.</p>	<p>27/08/2015</p> <p>17/07/2015</p>

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.