

Compliance Assessment Report

Report ID:
CAR_NRW0032455

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

Site	Stiens Skip And Recycling Facility	Permit Ref	MB3193HZ		
Operator/Permit holder	Stiens Haulage Ltd				
Regime	Waste Operations				
Date of assessment	07/11/2017	Time in	10:30	Out	11:30
Assessment type	Audit				
Parts of the permit assessed	All permitted area				
Lead officer's name	Medcraft, Jodie				
Accompanied by					
Recipient's name/position	Craig Stiens/ Technically Competent Manager	Date issued	15/11/2017		

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
C2 - General Management - Management system and operating procedures	X	
D2 - Incident Management - Accidents, emergency and incident planning	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

Present

Craig Stiens – Technically Competent Manager

Jodie Medcraft – Natural Resources Wales

Laura Phillips – Natural Resources Wales

The purpose of the visit was to assess compliance of Steins Haulage Limited with their Environmental Permit EPR/MB3193HZ. We were met on site by Craig Stiens, the Technically Competent Manager (TCM) for the site.

Environmental Permit and Environment Management System

I requested to see copies of the Environmental Permit and Environment Management System. The Environmental Permit was readily available and the Environment Management System was held on a CD provided by Joe Gately, the Environmental Consultant who undertook the Permit Application for the site. Advice was given that it was important to ensure that copies of both these documents are available at all times on site and staff have access to up to date copies.

Action – Please provide Natural Resources Wales with a copy of your Environment Management System.

WAMITAB

Craig Stiens is the current Technically Competent Manager (TCM) for the site. A copy of the certificate was provided. The current qualification is valid until the 21st September 2019, at which time a continuing competency course will be booked to ensure the qualification is kept up to date.

Fire Prevention and Mitigation Plan

Following our Standard rule permit consultation in Autumn 2016, we have made changes to the standard rule set (Environmental permit) you hold.

For a number of standard rule sets, you will now be required to manage and operate your activities in accordance with a written Fire Prevention and Mitigation Plan (FPMP). This plan must be produced in accordance with the current guidance. To access the FPMP guidance, please visit;

<https://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

As an existing permit holder of one of the affected rule sets, (SR2008 No. 1 – Household, Commercial and Industrial Waste Transfer Station) the amended conditions come into effect three months after they are published. This should have happened on the first of November 2017. However, due to an error in the system, a copy of the letter informing you of this was never issued to your site meaning you were not aware of the new requirements and the need to have prepared and implemented a Fire Prevention and Mitigation Plan. As such, I propose a period of three months to allow you to prepare, submit and implement this document.

This document is now a requirement of your Environmental Permit under Condition 3.4.1;

“The operator shall manage and operate the activities in accordance with a Fire Prevention Plan using the current, relevant fire prevention plan guidance”

Action – Please prepare and submit to Natural Resources Wales, a Fire Prevention and Mitigation Plan in line with the document “Fire Prevention & Mitigation Plan Guidance – Waste Management”, to be implemented by Friday 9th February 2018.

Waste Returns

It is pleasing to note that Stiens Haulage Limited is in compliance with this condition and all waste returns have been completed and submitted in line with the below required timescales;

Quarterly Returns Period	Return Submission Deadline
Q1 – 1 st January to 31 st March	30 th April
Q2 – 1 st April to 30 th June	31 st July
Q3 – 1 st July to 30 th September	31 st October
Q4 – 1 st October to 31 st December	31 st January

Please note that as per Condition 4.1.1 of your Environmental Permit;

“All records required to be made by these standard rules shall:

- a. Be legible*
- b. Be made as soon as reasonably practicable;*
- c. If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and*
- d. Be retained, unless agreed by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:*
 - (i) off-site environmental effects; and*
 - (ii) matters which affect the condition of the land and groundwater.”*

Following the discussion in the office a walk around the permit site was taken. Despite being a small site, it was pleasing to see that the yard was well organised and tidy. No waste is tipped in the yard. All waste

is either tipped inside the building or sorted directly from the skips and segregated into the appropriate containers located inside the building.



Many thanks to all staff for their time during the inspection.

EPR Compliance Assessment Report

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Operator/Permit holder	Stiens Haulage Ltd	Date	07/11/2017

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			
D2	X	Please prepare and submit to Natural Resources Wales, a Fire Prevention and Mitigation Plan in line with the document "Fire Prevention & Mitigation Plan Guidance - Waste Management"	09/02/2018
C2	X	Please provide a copy of your Environmental Management System/Working Plan to Natural Resources Wales	08/12/2017

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.