

Compliance Assessment Report CAR_NRW0039243

Permit being assessed: QB3032RW.

For: Swansea Baling Plant, held by City And County Of Swansea

At: Swansea Enterprise Park, Swansea, SA6 8QN.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 21/01/2022 between 10:00 and 11:45.

Parts of permit assessed: A, B, C, D, F

NRW Lead Officer: David Morgan, accompanied by Sally Wakeford.

Report sent to: Chris Fender, Waste Manager on 31/01/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	C4 No impact	1.1.1 (a)

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
F3	Remove litter from site boundary and inspect fencing/netting to ensure it is suitable to prevent litter escaping site. Ensure boundary checks are being undertaken as is stated in the	25/02/2022

Criteria	Action needed	Complete by
	Environmental Management System.	

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

A routine site inspection was undertaken on Friday 21st January 2022. The previous inspection took place on 15th August 2019.

Present at the time of the inspection were: David Morgan (Natural Resources Wales, Sally Wakeford (Natural Resources of Wales) and Chris Fender (City and County of Swansea).

The purpose of the inspection was to assess compliance with the Environmental Permit and to obtain an update on operations and how they might have changed following the Covid-19 pandemic.

The following observations were made:

Site Inspection

Waste Storage and Treatment

An inspection of all operational areas of the site was undertaken. It was noted that a number of operations have changed in the last two years.

Generally, waste storage and treatment operations are very well organised. The site remains to be extremely busy and high standards of housekeeping and organisation have been maintained. All wastes are clearly segregated and labelled. Waste management activities are clearly defined and do not infringe upon other activities.

It was noted that some of the smaller scale commercial waste activities on site were now being hand sorted on site. This will increase recycling rates. Whereas there is no perceived issue with this activity, can you please update the Environmental Management System to reflect these changes.

Food Waste

The storage container 'hot box' that was used to store food waste has now been removed. A new storage unit has been put in its place. Whereas there was no perceived difference in terms of compliance, please ensure all changes to operations are reflected in the site's Environmental Management System (formerly titled the 'Working Plan'). This will ensure all risks of potential pollutions from this change in storage practice (namely odour in this case) are identified, mitigated and documented. All liquid residue from this operation is contained

within this area.

Other notable changes to operations were the discontinuation of the picking line and the alternative arrangements for storage and treatment of paper and card waste (green bag waste).

Site Infrastructure

Despite the high volume of site traffic and movements, site infrastructure appears to be very well maintained. There did not appear to be any significant damage to the site surface. There were no areas where the site surface was damaged and water was ponding/pooling.

Site Boundary

Following the inspection of the operational areas of the site, we walked the perimeter of the site. In areas offsite, there was evidence that some waste/debris had escaped site. Due to the scale and nature of operations on site, and weather events in recent times, there is potential for site waste/debris to escape from site.

On the public cycle path outside the site (on the right hand side upon entering from Ferryboat Close) we saw a number of City and County of Swansea Recycling bags (empty) which had potentially been blown off site. It was agreed that these would be removed by the operator.

At the fence to the rear of the site, there was a minor build up of litter/debris that had escaped from the site. This appeared to be mainly soft/hard plastics. Although minor in its nature, this debris did run a significant way along the perimeter fence. This did not have an impact on the environment, but if allowed to build-up, could have a detrimental impact on the local amenity.

A non-compliance was recorded against Condition 1.1.1 (a) of the Environmental Permit (Category 3 - Minor)(Ref:F3)

Item 5.5.1 of the Environmental Management System for the site (referred to as the Working Plan) states that the boundary fence acts as a prevention measure to stop litter escaping site, and that weekly checks are undertaken to remove litter.

Please ensure this part of fencing is assessed to ensure whether it can prevent litter escaping from site. Also, please ensure staff continue to make boundary checks, remove litter, and record this activity.

Summary

It is noted that a number of activities on site have changed slightly since the last inspection (15th August 2019), most notably the food waste storage.

While there were no non-compliances recorded against any on site waste management activities, you must ensure all changes are reflected in the sites' EMS.

A minor non-compliance was recorded following a check of the site boundary where it was

identified that some litter/debris had escaped site.

Given the scale of the operations, the volume of waste managed and number of traffic movements on site, the site appeared to be very well managed and continues to be largely compliant with the Environmental Permit..

Environmental Management System

The most recent version of the Environmental Management System (EMS) that Natural Resources Wales has on record is dated 19/03/2018.

As you are aware, the EMS is a 'live' document and should be continuously updated to reflect onsite operations. Can you please ensure the EMS is updated to reflect all on-site changes to operations and procedures, and that a copy is sent to Natural Resources Wales for our records.

We request that an updated EMS is sent to us by Friday 1st April 2022.

Thank you for your time during the visit.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.