

	EPR Compliance Assessment Report	Report ID: 100343/0243476			
This form will report compliance with your permit as determined by an NRW officer					
Site	Hafod Yard		Permit Ref	100343	
Operator/ Permit holder	Enviroclear Site Services Limited				
Date	19/06/2015		Time in	11:00	Out 11:35
What parts of the permit were assessed	Permitted Area				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op X	Water Discharge
Recipient's name/position	Arthur Imrie				
Officer's name	Andrew Sowerby		Date issued	10/07/2015	

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	A	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	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	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	NA	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	A	
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	0	Total compliance score (see section 5 for scoring scheme)	0
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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.

Comments

The regulating officer for this site has now changed to Andrew Sowerby. Should you wish to contact me please either phone 0300 065 3806 or email andrew.r.sowerby@naturalresourceswales.gov.uk.

This initial inspection of the site was not pre-arranged. As a result Arthur Imrie was not on site to discuss the site and its operations. Officer was therefore shown around the site by Liam.

Inspected the waste transfer building. One side of the building is used for the storage of plasterboard and cardboard (in separate bays), the opposite side of the building is used to store liquid hazardous wastes, such as oily water in drums and IBCs etc.

A number of fridges were observed on the ground next to the building along the perimeter fence.

Also next to the building is the treatment area. This area has been treated with a red resin/paint. This red material should seal the ground to ensure it is impermeable. On this treatment area there is a machine that is used for shredding plastic tubs and containers. There is also a compactor that is used to compact waste rags etc. into a sealed container.

Along the rear perimeter of the site between the containers there was a drain that at that time looked to be accepting yard run off. According to the draft Environment Management System (EMS) submitted in October 2013 the drainage on this part of the yard should flow to an interceptor where any oils will be dealt with. This interceptor then discharges to soakaway. There is a separate permit to discharge (CG0411501) which the site should be aware of and should ensure they comply with. This permit was transferred into the name of Enviroclear Site Services Ltd on the 27th February 2013. This permit only allows the site to discharge very low levels of oils/greases and suspended solids in any clean surface water discharged to the soakaway. It is recommended you include basic checks on this discharge in your EMS via the sample point mentioned in the permit.

Further along there is a bay constructed of legio blocks. This is used for storage of inert material. During this inspection the bay contained a relatively small quantity of soils. Care should be taken to ensure no runoff from this area goes to the surface water drains which are located nearby. Any runoff is likely to increase suspended solids in the discharge or even result in blocking the drains.

There was a large quantity of IBCs and drums on site. The officer was informed that these were all empty and the ones checked did not appear to contain anything.

There was also a number of polystyrene and metal insulation panels that the officer was told had been an issue due to the polystyrene crumbling whenever the panels were moved. These are stripped down in the building in order to contain any mess and salvage the metal.

In the far corner of the site there is a wood pile. The wood is unprocessed.

Next to the wood pile there were a number of tyres that the officer was informed had been left on site by the previous owner. Enviroclear have been steadily clearing the site of all leftover waste from the previous owner and these are the last bits.

The site has a number of waste exemptions registered including a S1 exemption for storage of waste in secure containers, S2 exemption for storage of waste in a secure place, T4 for preparatory treatments

(baling, sorting, shredding etc) and T6 exemption for treatment of waste wood and plant matter by chipping, shredding, cutting or pulverising.

The waste oils are being accepted under the S1 exemption. Please ensure you are aware of the 3 cubic metres limit on the amount of waste oils you can store under this exemption.

Any waste accepted under the exemptions should not be mentioned on any quarterly waste returns submitted to us.

Overall no issues were observed with the permitted activities on this inspection.

In this document, 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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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.	☐
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.	☐
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			

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.