

Compliance Assessment Report

Report ID:
CAR_NRW0032928

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

Site	City Skips Transfer Station	Permit Ref	NP3997EE		
Operator/Permit holder	City Skips (N W) Limited				
Regime	Waste Operations				
Date of assessment	15/02/2018	Time in	11:50	Out	12:10
Assessment type	Site Inspection				
Parts of the permit assessed	Emissions - land and water, site security				
Lead officer's name	Peel, Louise				
Accompanied by	Paul Challenger				
Recipient's name/position	Rhodri Roberts/ Director	Date issued	22/02/2018		

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
D1 - Incident Management - Site security	C3	B:3
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

INCIDENT RESPONSE INSPECTION

This was a site inspection following an incident notification from a member of the public that there was leachate discharging from the waste stored on site. The visit was conducted by Senior Environment Officer, Louise Peel, and Environment Officer, Paul Challender. There were two site operatives on site, but Rhodri Roberts was not on site at the time of the inspection.

The purpose of this site visit was to ascertain whether there was any leachate from the waste discharging off site. This was not a routine site inspection, therefore no other parts of the permitted activities were assessed (apart from site security as detailed below), although comments are detailed below on observations made and information received from the site operatives.

No leachate was observed discharging from the site during the time of inspection. It was not possible to access the back of the site due to the volumes of waste being stored and therefore we were unable to establish whether there was an issue with leachate at the back of the site.

A small area of the site had been cleared and part of the site fencing had been removed in order to allow heavy plant to access the waste wood stockpile to remove some waste wood. There were several skips of wood waste and mixed waste stored outside the fenced area on the back of wagons and on the car parking area which were yet to be deposited on site. The site operatives stated that a Gwynedd Skips wagon was due about 14:30 that afternoon to remove a load of mixed waste destined for landfill. No other waste apart from some waste wood had left site that week.

The volumes of waste on site continue to be an issue, as is the fact that waste is being stored outside the permitted area. These issues have been picked up in previous site inspections by the lead officer, Steven White, and enforcement action is ongoing to address these non-compliances.

Site security is now a concern as part of the fencing had been removed, and although the permitted area is in currently in dispute with the operator, the site does need to be adequately secure to prevent entry by non authorised persons. As such a breach of permit condition has been applied.

D1 Site security - CCS 3 breach has been applied for non-compliance with permit condition B:3 as part of the site fencing had been removed in order to allow heavy machinery to access the waste wood stockpile. It is imperative that the site should be secure. Please ensure the missing fencing panels are replaced and the site is secure.

Photographs taken during the inspection:

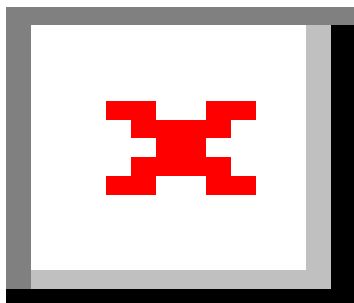
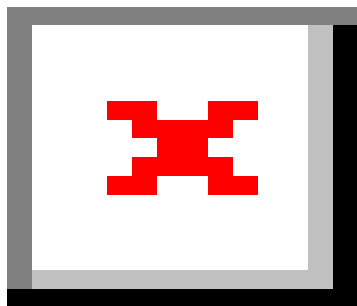


Photo showing missing fencing panels



Skips containing mixed waste stored outside the fenced area waiting to in to site

EPR Compliance Assessment Report

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Operator/Permit holder	City Skips (N W) Limited	Date	15/02/2018

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			
D1	C3	Replace fencing panel and secure site	21/02/2018

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.