

Compliance Assessment Report

Report ID:
CAR_NRW0033557

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

Site	North Wales Skip Hire Ltd	Permit Ref	HB3393HC		
Operator/Permit holder	North Wales Skip Hire Limited				
Regime	Waste Operations				
Date of assessment	26/06/2018	Time in	09:57	Out	11:01
Assessment type	Site Inspection				
Parts of the permit assessed	See below				
Lead officer's name	Challender, Paul				
Accompanied by	White, Steven				
Recipient's name/position	Mr Dahne Gizzi/ Operator	Date issued	06/07/2018		

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
A1 - Specified by permit	X	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	Permit Condition 2.3.1, Table 2.3
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	Permit Condition 4.2.2

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	2	Total compliance score (see section 5 for scoring scheme)	4.1
------------------------------------	----------	---	------------

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

This was a routine pre-arranged inspection visit by Environment Officers (EOs) Paul Challender and Steven White. The operator Mr Dahne Gizzi and his consultant Marco Muia, who is currently acting as the Technically Competent Manager (TCM) for the site were both present at the site. During the inspection the weather was hot, still and bright.

The site is enclosed by walls and palisade fencing; no litter, dust, odour or noise could be perceived from outside the boundary of the permitted site. In addition, there was no evidence of mud or other debris on the road.

Improvements had been made to the storage of materials on the site since the last inspection. The tyres and the PVC window frames had been removed and the removal of the baled cardboard is on going. Most wastes stored in containers were stored wholly within the containers which appeared to be in a serviceable condition.

One container containing green waste (logs, trunks and branches) was however, full to capacity and overflowing onto the concreted area. Please ensure that all non-specified wastes are stored in a suitable container of an effective capacity of the waste by either utilising larger volume containers or multiple containers.



The volumes in the waste piles adjacent to this skip were lower and the storage area in general was tidier and was benefitting from the lower stored volumes in the yard. There was still however, 2 piles of specified waste stored in the yard namely, wood and metals (metals are stored behind the skips in the picture below). Although the piles were reduced compared to the last inspection visit these waste types are still not permitted to be stored outwith a building or container. It was suggested by the consultant Mr Muia that the registered exemptions at the site permitted this activity but these waste streams are the result of the sorting of mixed waste brought to site in skips under the conditions of the permit. Exempt waste activities may take place within the permitted area but they must be entirely discrete from permitted operations. A resolution was discussed between Mr Muia and Mr Gizzi with the possibility of utilising 40 cubic yard skips being discussed. The storage issues are discussed below.



A selection of waste transfer notes were viewed with no apparent issues noted. The Fire Prevention & Mitigation Plan for the site had not been submitted prior to the inspection. Mr Muia stated that this was being finalised by his colleague and would be submitted soonest. The required date for submission of this document is 13/07/18.

On return to the office submitted Waste Returns were checked the last 5 quarter's Waste Returns had not been submitted. This is discussed below.

The following breaches to the permit have been recorded:

(G4) Reporting and notification to Natural Resources Wales. Permit Condition 4.2.2. CCS Score 4.

It has been noted from our records that you have not submitted Waste Returns for Quarters 1, 2, 3 or 4 of 2017, Quarter 1 of 2018 and Quarter 2 of 2018 is due by the end of this month. Permit condition 4.2.2 requires “within one month of the end of each quarter, the operator shall submit information relating to the site and the waste accepted and removed from it during the previous quarter”. You must ensure that you submit waste returns at the end of each quarter. This is a breach of your permit conditions and a CCS 4 non-compliance has been applied on this occasion. Please submit the missing returns by the date stipulated in *Section 4 - Actions* of this form. Any further non-compliances of this permit condition may result in further action being taken.

(C4) Storage, handling labelling and Segregation. Permit Condition 2.3.1, Table 2.3. CCS Score 3.

During the inspection there were 3 instances of specified waste being stored outside a container or building.

One skip was full to overflowing of (green waste) logs and trunks. If a container is full it should not be added to. The storage capacity for this waste type needs to be increased either by utilising a bigger container or multiple containers.

There were 2 piles of non-specified waste stored in the yard. These wood and metal waste types are not permitted to be stored outwith a building or container. All non-specified waste needs to be stored in a building or container to be compliant with permit conditions which are written so as to reduce the potential from pollution from non-inert waste types. Please refer to Section 4.4 of your standard rules SR2008 No3 for a list of the specified waste EWC codes which may be stored outwith a building or container and ensure all waste types are stored as per the permit condition.

Thank you for your time during this inspection.

Paul Challender - Environment Officer

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.

--

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033557**

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

Site	North Wales Skip Hire Ltd	Permit Ref	HB3393HC
Operator/Permit holder	North Wales Skip Hire Limited	Date	26/06/2018

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.

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			
G4	C4	Complete and submit outstanding waste returns	03/08/2018
A1	X	Submit FPMP as discussed on site	13/07/2018
C4	C3	Stored all non-specified waste in the building or in a secure container; or remove from site in a manner that complies with Duty of Care.	31/08/2018

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.