Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: 100069/0209088

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

Site	Former J R Steelworks			Permit Ref	100069		
Operator/ Permit holder	Griffiths Waste Management Ltd						
Date	16/05/2014			Time in	13:15	Out	14:30
What parts of the permit were assessed	A, B, C, D, F						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Andrew Wright - Commercial Director						
Officer's name	David T Morgan, Jonathan Jones			Date issued	30/05/2014		

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	C3		1.1.1;
b) Infrastructure	**1.** Engineering for prevention & control of pollution	N		
	2. Closure & decommissioning	N		
	3. Site drainage engineering (clean & foul)	C3		2.1.1;
	4. Containment of stored materials	N		
	5. Plant and equipment	N		
c) General management	**1.** Staff competency/ training	N		
	2. Management system & operating procedures	A		
	3. Materials acceptance	C4		2.2.1 (a);
	4. Storage handling, labelling, segregation	N		
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	N		
f) Amenity	**1.** Odour	A		
	2. Noise	A		
	3. Dust/fibres/particulates	A		
	4. Pests, birds & scavengers	A		
	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	N		
	2. Energy	N		

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	3	**Total compliance score** (see section 5 for scoring scheme)	8.1

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.

A routine site inspection was undertaken on Friday 16th May 2014. Following a change in regulating officer this was the first site inspection conducted by David Morgan who is now the site responsible officer.

Areas of the permit which were assessed related to infrastructure, waste storage and waste acceptance.

Infrastructure

It is recognised that there is an ongoing issue with the site surface. The permit requires all waste to be stored on impermeable or hard-standing surfaces. At the time of the inspection waste was being stored on unmade ground and as a result a non-compliance with the permit was recorded.

Condition 2.1.1 of the permit was breached (Category 3 - Minor) (Ref:B3)
Large volumes of waste are stored on areas of the site which are not hard-standing or impermeable surfaces. To become compliant with this condition all areas of the site that are used to store waste must have either a hard-standing or impermeable surface.

While on site it was suggested that the whole site is benefitted by Teram liner and HDPE membrane. Could you please provide further information on this (photographs etc.). If areas of the yard which store waste do not have this in place and are unmade ground it may result in a higher non-compliance rating being recorded.

If you intend to modify this condition in the permit to allow waste to be stored on unmade ground please ensure the application is submitted as soon as is practically possible. This application will need to be supported by a technical assessment of the impact this will have on the environment.

Areas of the site that were impermeable appeared to be in a very good condition. The surfaced area of the site on which the shredder is stored was free from damage and is well maintained.

Waste Storage

An inspection of the stockpiles on site was undertaken. Measurements of distances between stockpiles were taken.

Condition 1.1.1 of the permit was breached (Category 3 - Minor) (Ref:A1)
Waste is not being stored in line with the standards set out in the site's Environment Management System and Fire Risk Assessment. The Fire Risk Assessment states that there must be breaks of 6 meters between piles. Three breaks were measured and were 4 meters. Also, the surface of the channels in between stockpiles were heavily laden with sawdust and chipped wood thus negating the break.

To become compliant with this condition please refer to the Fire Risk Assessment and make adjustments to the stockpiles to meet the required standards. Channels between stockpiles should be free from sawdust and chipped wood.

It was noted that the site has created an embankment to load vehicles and machinery. The material used to construct this embankment is waste wood (sawdust and chipped/shredded wood). This is classed as a permanent deposit of waste and should be removed. Whereas we would support the use of certain waste materials in construction the appropriate procedures must be taken. It is suggested that the embankment is removed in stages and another material is sourced (possibly construction and demolition materials). Also, you may need to consult the local authority planning department when constructing such structures.

Waste Acceptance

The majority of waste on site appears to be compliant with the waste permitted to enter site. There is a small amount of non-permitted waste on site including fridges, metals etc.

Condition 2.2.1 (a) of the permit was breached (Category 4 - Minor) (Ref:C3)
There were fridges, scrap and other wastes on site which are not permitted. Please ensure this waste is taken to an appropriate facility and future non-compliant wastes are rejected.

Amenity

At the time of the inspection the site's activities appeared to have no detrimental effect on the local amenity. There was no mud/debris on the road at the entrance of the site. All vehicles carrying waste that entered and left the site during the inspection were covered. Outside the site there were no visible signs of dust/waste leaving site. There was no sawdust/wood chip leaving the site. Although a small amount of leachate has built up on site there was no noticeable odour which may have an impact on the local amenity.

Please ensure these standards are maintained in the future.

Environment Management System

It is suggested that the Environment Management System (EMS) and supporting documents are reviewed and amendments are made where necessary. The Environment Management System states that only clean or uncontaminated wood will be accepted on site. However this is contradicted in that a main source of wood is from civic amenity sites.

The document titled 'An Assessment of The Potential Impact To The Aquatic Compartment For GPS Recycling Activities' states that waste is stored on site for a maximum of 7 days in the winter and four weeks in the summer. A result of this is that there is no leachate produced on site. During the inspection traces of leachate were clearly visible.

The EMS states that there will be no ponding of water on site. At the main waste reception area there is a large pool of water. It is suggested that Griffiths Waste Management undertake a full review of these documents and ensure procedures on site meet the requirements set out in these documents.

Action Plan

It is suggested that Griffiths Waste Management produce an action plan to clearly map out a scheme to bring the site in compliance. This should prioritise certain actions beginning with adjusting the stockpiles to meet the standards set out in the fire risk assessment.

Thank you for your time during the inspection.

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Operator/ Permit	Griffiths Waste Management Ltd	Date	16/05/2014

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.	X
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			
A1	C3	Make adjustments to stockpiles and ensure they meet the standards set out in the Fire Risk Assessment. Channels between stockpiles must be free from sawdust/wood chip and shredded wood.	01/08/2014
B3	C3	Install hard-standing or impermeable surfaces for all areas that are considered unmade ground and where waste is stored/treated. An agreed completion date will be agreed at a future meeting on site.	N/A
C3	C4	Remove non-compliant wastes from site and ensure future loads of non-compliant wastes are rejected upon arrival.	01/08/2014

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.