

Glogue Quarry Transfer Station

Llanfyrnach

Hermon

Pembrokeshire

SA36 0ED



Compliance Assessment Report for QP3195FQ

Dear Mr Davies,

Please find attached a copy of the Compliance Assessment Report (CAR) following the compliance visit/audit undertaken by Bacon, Liane on 06th April 2016.

Please review the report and provide comments back as appropriate within 15 working days of receipt. If we do not receive any comment within 15 working days we will assume that you are satisfied with our findings and the document will be published to the public register.

As discussed in our meeting on the 6th April 2016 and in written correspondence on the 05 February 2014 from Ross Grisbrook, the current hazardous waste transfer station permit needs to be varied to reflect changes in legislation. This would modernise conditions and incorporate the limitations of the Industrial Emissions Directive that apply to facilities that have the capacity to store more than 50 tonnes of hazardous waste per day.

You have indicated to Natural Resources Wales that you wish to surrender the permit and in our meeting it was agreed that a surrender application would be submitted to Natural Resources Wales by the end of **July 2016**. If we do not receive an application then we will commence the process of varying the permit to incorporate and reflect the new legislation. This will be a Natural Resources Wales initiated variation and you will be re-charged for the costs incurred.

Surrendering an Industrial Emissions Directive permit is more onerous than a Waste Management Licence so it is recommended that, if you do intend to surrender the permit, you do so prior to us commencing the variation.

To surrender the permit you are required to demonstrate that either that there can be no risk of further contamination from the site or to quantify what contamination has occurred and to address that contamination as appropriate. This can be done in two ways and NRW will use an appropriate combination of the two.

Natural Resources Wales
Llys Afon, Hawthorn Rise,

Haverfordwest,
Pembrokeshire,
SA61 2BQ

General Enquiries: 03000 65 3000
Incident Hotline: 0800 80 70 60

www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

1. Show that the measures necessary to prevent contamination were appropriate and maintained throughout the lifetime of the permit; and any contamination that did occur was promptly and effectively dealt with and records have been kept to demonstrate that.
2. Compare the characterisation data provided at application and surrender to show if there has been any contamination from the operation. Site Condition Reports are used to show this.

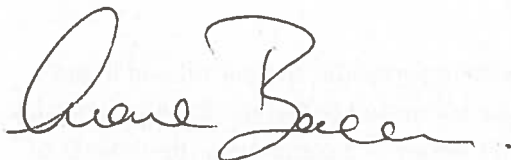
The Transfer Station is licensed under the Control of Pollution Act and licensed in 1992. Those site licensed before 1994 were not required to assess the state of land or groundwater prior to operations but a letter would have been sent advising you to maintain records that demonstrated the measures taken to protect land and groundwater.

If your records are not complete and your activity had the potential to impact land or groundwater, then the only way to demonstrate that the condition of the land is satisfactory is to undertake a site investigation. For your investigation you will need to take soil and groundwater samples around the tanks and at a depth below the base of the tank. The samples should be chemically analysed for hydrocarbons.

You will need to submit a surrender Site Condition Report (SCR) that describes the condition of the land and groundwater at the time of the surrender. This report will provide the basis for our judgement as to whether unacceptable pollution risks have been removed and the site is in a satisfactory state. I have enclosed guidance on the completion of SCR that explains what information we expect and provides a template.

If you have any questions regarding the attached report please do not hesitate to contact me.

Yours sincerely



Liane Bacon
Environment Officer

Direct dial: 03000653571

liane.bacon@cyfoethnaturiolcymru.gov.uk

Natural Resources Wales
Llys Afon, Hawthorn Rise,

Haverfordwest,
Pembrokeshire,
SA61 2BQ

General Enquiries: 03000 65 3000
Incident Hotline: 0800 80 70 60

www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Compliance Assessment Report

Report ID:
CAR_NRW0017486

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

Site	Glogue Quarry Transfer Station	Permit Ref	QP3195FQ
Operator/Permit holder	Mansel Davies & Son Ltd		
Regime	Waste Operations		
Date of assessment	06/04/2016	Time in	12:00
Assessment type	Audit	Out	13:00
Parts of the permit assessed	security		
Lead officer's name	Bacon, Liane		
Accompanied by	Thomas, Ffion		
Recipient's name/position	Mr Stephen Davies/ General Manager	Date issued	22/04/2016

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	A	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	---	---	---

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

The visit was conducted on the 6th April 2016 by Liane Bacon and Ffion Thomas. It was an announced visit and we met with Mr Stephen Davies. The purpose of the meeting was to discuss the future plans for the facility.

No issues identified with site security. The site does not accept waste as it has been non-operational for many years.

Permit Surrender

As discussed in our meeting and in written correspondence on the 05 February 2014 from Ross Grisbrook, the current hazardous waste transfer station permit needs to be varied to reflect changes in legislation.

You have indicated to Natural Resources Wales that you wish to surrender the permit and in our meeting it was agreed that a surrender application would be submitted to Natural Resources Wales by the end of July 2016. Further information on surrendering the application has been enclosed with this Compliance Assessment Report.

Please be mindful that if we do not receive an application to surrender then Natural Resources Wales will commence the process of varying the permit to incorporate and reflect the new legislation. This will be a Natural Resources Wales initiated variation and you will be re-charged for the costs incurred.

Please contact me if you have any queries.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

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



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0017486**

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

Site	Glogue Quarry Transfer Station	Permit Ref	QP3195FQ
Operator/Permit holder	Mansel Davies & Son Ltd	Date	06/04/2016

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			

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 reports 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 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.