

Compliance Assessment Report

Report ID:
CAR_NRW0032319

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

Site	Ffridd Rasus Landfill (Area 2) & Civic Amenity Site	Permit Ref	PP3294FJ		
Operator/Permit holder	Gwynedd Council				
Regime	Waste Operations				
Date of assessment	12/10/2017	Time in	10:00	Out	12:00
Assessment type	Site Inspection				
Parts of the permit assessed	As below				
Lead officer's name	Thomas, Rhys				
Accompanied by					
Recipient's name/position	Steven Edwards/ TCM	Date issued	18/10/2017		

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	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	C3	2.1.1
C4 - General Management - Storage, handling labelling and Segregation	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	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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
-----------------------------	---	--	---

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

EPR/PP3294FJ - Civic Amenity Site

Pre-arranged site inspection carried out by Environment Officer Rhys Thomas. Accompanied on site by Steven Edwards and Susan Francis of Gwynedd Council. A discussion took place at the site office initially. During the discussion the review of waste returns, fire prevention plan and potential permit variations were covered.

Waste Returns:

A review of the sites waste returns was carried out by NRW prior to the site visit. The review focused on waste returns submitted for 2015, 2016 and 2017. All waste returns had been appropriately submitted to NRW as required during this period. Some EWC codes were reported under this permit that are not listed in the permit. These are listed below:

160303 – 'De-greaser'. Recorded during 2015.

160504 – 'Aerosols'. Recorded during 2015 and 2017.

160108 – 'Mercury'. Recorded in 2016 Q3.

160304 – 'Sodium carbonate & Calcium Chloride'. Recorded in 2016 Q3.

These were discussed during the visit and most of these apart from EWC 160504 'Aerosols' are not actively accepted on site and would have been treated as quarantine waste. To continue accepting EWC 160504 on site you will need to apply for a permit variation to add this waste code to the permitted list of wastes.

Other issues that were noted during the review of the waste returns are:

200101 'Tetra' – The EWC is for paper and cardboard. Should EWC 150105 (Composite packaging) be used for Tetra? If so, this EWC will also need to be included to the permitted list of wastes via a permit variation application.

200110 'Textiles' – Correct EWC for textiles should be 200111. EWC 200110 is for 'clothes'. Please ensure the correct EWC is used.

200199 'Furniture' – Returns for 2015 showing EWC 200199 used for recording furniture. This waste stream should be recorded as 200307 'Bulky Waste'. This issue has been resolved since 2016 and the correct EWC Code is being applied.

The following breach of permit condition has been recorded as a result of the waste returns review:

C3 General Management – Materials Acceptance. Permit condition 2.1.1. CCS Score C3.

Waste returns data shows the site have been receiving EWC 160504 'Aerosols'. This waste type is not currently listed in the permitted list of wastes. This is a breach of permit condition 2.1.1, referring to Table S1.1, which states that only wastes as specified in Table S2.1 shall be accepted.

Action: To continue accepting this waste type a permit variation should be applied for to include the appropriate EWC Code to the permit.

Site visit:

A Fire Prevention Plan is currently being prepared as there is a requirement under the Transfer Station permit for one to be in place. This fire prevention plan is also likely to cover activities under the CA site permit as well.

As discussed during the visit, permit variation / consolidation options will be considered for the CA Site permit, to better reflect current operations on site. Further advice will be provided in separate correspondence.

The site was tidy and organised during time of visit and all wastes were appropriately stored. Activities on site were not giving rise to any amenity issues.

If you would like to discuss anything mentioned in this report please contact Rhys Thomas on 03000 65 3765, rhys.thomas@cyfoethnaturiolcymru.gov.uk

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032319**

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

Site	Ffridd Rasus Landfill (Area 2) & Civic Amenity Site	Permit Ref	PP3294FJ
Operator/Permit holder	Gwynedd Council	Date	12/10/2017

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.

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.

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			
C3	C3	To continue accepting this waste type a permit variation should be applied for to include the appropriate EWC Code to the permit.	30/11/2017

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.