

Compliance Assessment Report

Report ID:
CAR_NRW0000073

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

Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ			
Operator/Permit holder	World Care (wales) Ltd					
Regime	Waste Operations					
Date of assessment	16/03/2016	Time in	14:00	Out	15:30	
Assessment type	Site Inspection					
Parts of the permit assessed	As below					
Lead officer's name	Thomas, Rhys					
Accompanied by						
Recipient's name/position	Lee Jones/ Site Manager	Date issued	07/06/2016			

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	1.1.4
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	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

Pre-arrange site inspection carried out by Environment Officer Rhys Thomas. Accompanied on site by TCM Lee Jones. Also present were Gwyn Roberts and Aled Thomas from North Wales Fire and Rescue Service (NWFRS). This joint visit with NWFRS is part of an initiative to reduce fire risk at waste sites across Wales.

During the inspection, advice was provided by the NWFRS officers to the operator regarding several aspects of site management. A summary of NWFRS officer's findings is noted below. Please ensure that this advice is noted and that relevant procedures are implemented into the site Management System and duly actioned as and when required:

1. Flammable Gas Cylinders – during the visit it was noted that there were flammable gas cylinders of various size and contents present. It was confirmed by the site operator that these cylinders were empty. It is however recommended that a specific secure cylinder storage area is available, with empty cylinders removed off site in a reasonable timescale. The procedure should then be included in the FPMP (if applicable).
2. On-site machinery should be subject to regular maintenance regime to assist in the prevention of fires caused by friction (e.g. worn bearings etc) or electrical faults. The arrangements should be included in the FPMP (if applicable).
3. If not already present, it is recommended that all site vehicles are fitted with fire extinguishers.
4. Access routes around the site to be maintained to a width of 3.7m to allow a fire appliance to be able to get to within approx. 60m of all areas.
5. In the absence of any dedicated water supply on site, any FRS response to an incident on site will require the provision of water from the public hydrant system. The provision of additional water supplies on site need to be considered within the FPMP (if applicable).
6. Generally the stacks on site are of an inert nature (building rubble, soil, windows, glass) with low flammable risk, however it is recommended that the highest risk material on site, being the processed wood sawdust piles are maintained at the required size and separation levels.
7. Provision of a thermal lance will allow the heat in the piles to be monitored for excessive temperatures.

During the inspection the following non compliance with permit condition was noted:

C4 General Management - Storage, handling, labelling, segregation. Permit Condition 1.1.4 (table 1.1) CCS Score C3.

During the inspection it was noted that a large amount of waste material is not being stored appropriately on site. Following the last inspection you were notified that there was a large amount of waste wood on site not stored within bays or containers as required by the permit. The amount of waste wood on site has reduced since the last inspection, however a small amount remains stockpiled outside the designated storage bay. There is also large stockpiles of plasterboard and inert material not stored within bays or containers.

Action: Ensure that all waste materials are stored within bays or containers and that any excess materials are suitably removed from site.

Observations:

Following the last site inspection, work has been carried out to improve some of the hardstanding surfaces on site which were previously uneven and subject to water pooling and rutting by vehicles. The hardstanding surfaces, particularly towards the back of the site were in much better condition. Please keep maintaining these surfaces to ensure that they remain even and free from standing water.

The site is now processing waste wood by shredding, with the shredded waste wood stored outside the permitted area, on land

that benefits from an S2 waste exemption. During the visit it was noted that the amount of shredded wood stored on the exempt area is close to the 100 tonne limit allowed under the exemption. You must ensure that you are fully aware of the conditions of the registered waste exemptions and that these are complied with.

Part of the boundary fence on the western end of site, between the permitted area and exempt area next door has been removed. There must be a clear distinction between the permitted site boundary and exempt area, with this boundary being clear and obvious to any inspecting officers. The wood shredding operation is also carried out at this area of site. You must ensure that this treatment activity fully occurs within the permit boundary.

A discussion took place regarding applying for a permit variation to extend the permit boundary to include the yard next door which is currently used as a storage area under the benefit of registered waste exemptions. Details of the relevant applications forms have been sent. If you require any further advice on this matter please contact the regulating officer.

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

Photographs:

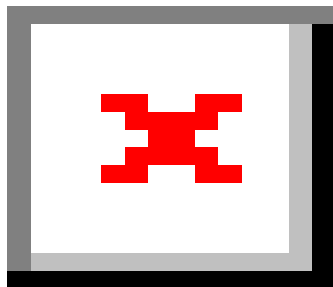


Photo1: Waste wood not stored within bay or container.

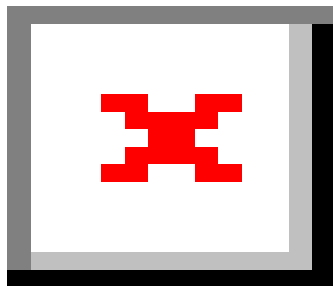


Photo 2: Showing plasterboard overflowing from designated storage bays. Also showing improved hardstanding surface in foreground.

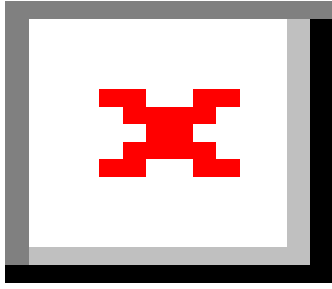


Photo 3: Inert material not stored appropriately within bays or containers.

EPR Compliance Assessment Report

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Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ
Operator/Permit holder	World Care (wales) Ltd	Date	16/03/2016

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.

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			
C4	C3	Ensure all waste materials are stored within bays or containers and any excess materials are suitably removed from site.	06/05/2016

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.