

Compliance Assessment Report

Report ID:
CAR_NRW0032478

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	06/11/2017	Time in	13:45	Out	14:45	
Assessment type	Site Inspection					
Parts of the permit assessed	As below					
Lead officer's name	Thomas, Rhys					
Accompanied by	Geraint Hughes NWFRS					
Recipient's name/position	Lee Jones/ TCM	Date issued	04/12/2017			

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.1
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	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
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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

Routine pre-arranged inspection carried out by Environment Officer Rhys Thomas. Accompanied by Geraint Hughes of North Wales Fire and Rescue Service who is currently on secondment with Natural Resources Wales looking at fire prevention and safety at waste sites. Officers met with TCM Lee Jones on site. Weather conditions at time of inspection were dry and overcast.

Purpose of inspection was to check compliance with a Regulation 36 enforcement notice that was served on 12th September 2017. The deadline for compliance with the notice was 12:00 noon on day of inspection (6/11/2017).

Initially, discussions took place in the site office. These discussions focussed around the Fire Prevention and Mitigation Plan Guidance. As discussed, Natural Resources Wales are currently carrying out permit variations on waste management sites to include fire conditions. This variation is likely to be carried out on your permit soon, and will require a fire prevention and mitigation plan to be in place. You should refer to the latest copy of the guidance for advice on how the plan should be implemented:

<http://naturalresources.wales/media/683222/guidance-note-16-fire-prevention-mitigation-plan-english.pdf>

Officers proceeded to the permitted area of site. Since the last inspection it was noted that improvements had been made, in line with the requirements of the enforcement notice. All wastes that were previously deposited outside the permitted area had been removed and this area was clear of any waste. The amount of waste stored on site had been reduced and were sufficiently stored within bays and containers. As discussed during the visit, the height of wastes stored within bays should be maintained so that wastes are not overtopping onto other bays. The Fire Prevention and Mitigation Plan Guidance also states that a 1 metre freeboard should be left between the waste and bay wall height.

A new bay for soils has been created on the concrete pad, in between the mixed waste and plasterboard storage areas. There remains a large amount of plasterboard stockpiled on site. Wastes were appropriately stored within bays at the back of site. Please remember that Fridges and Freezers need to be stored on an impermeable surface with sealed drainage. As discussed during the visit these will now be stored on the concrete pad in the middle of site.

Site surfaces were generally in a poor condition and there was mud being tracked through the site and out of both site access points on to the highway. A sweeper was being operated along these areas at the time. As is stated in the permit (4.1.3) traffic should be isolated from areas of mud and debris within the site to

prevent further tracking of mud and debris, and measures shall be taken to clear any such sources as soon as practicable.

The following breach of permit condition has been noted:

B1 Infrastructure – Engineering to control Emissions. Permit condition 2.1. CCS Score C3.

Permit condition 2.1 (Table 2.1) states that areas of hardstanding shall remain even, shall not be subject to rutting by vehicles, and shall remain free from standing water. As mentioned above, parts of the site surfaces do not meet these standards and this is causing mud to be tracked through site and onto the public highway. Site surfaces should be maintained so that they have sufficient durability to avoid rutting by vehicle movements and drainage channels and gullies should be maintained so that they remain fit for purpose and drain standing water from the surfaces.

Action: Maintain site surfaces and drainage in line with standards set out in permit condition 2.1

As has been mentioned to you previously, a distinct boundary needs to remain in place around the permitted area of site, including between this area and the adjacent storage yard where waste exemptions are registered.

All outstanding Waste Returns have been submitted to Natural Resources Wales, as required by the notice.

During the inspection officers also visited the adjacent yard currently used for storing wastes under registered exemptions. Several of the breaches of exemption criteria previously identified in this area have been addressed. There remains a large amount of green waste stored in this area. Operator has been working to find a suitable outlet for this material and this material is due to be removed during the next few weeks. Separate correspondence will be sent regarding operations carried out under exemptions in this area, as this does not form part of the permitted site operations.

Please ensure that standards are maintained and that the amount of waste stored on site does not exceed what can be contained within skips and bays. Further non-compliances could lead to further enforcement action being taken.

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:

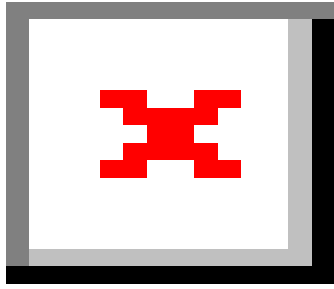


Photo 1: General view from site office. Site surface in poor condition in front of trommel and mixed waste stockpile.

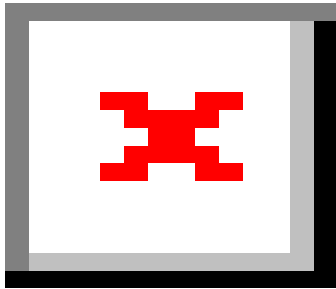


Photo 2: Storage bays beneath trommel / picking line.

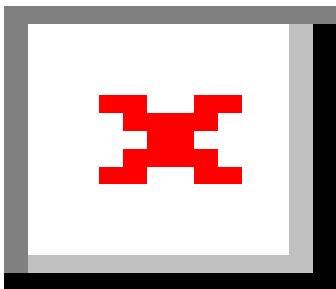


Photo 3: Soil and plasterboard storage areas.

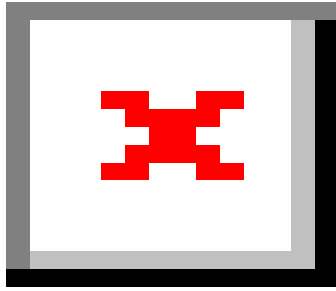


Photo 4: Wood storage bay.

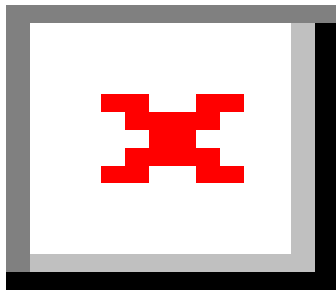


Photo 5: Storage bays at back of site. Improvements required to site surface.

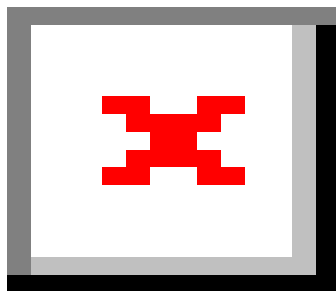


Photo 6: Mud and dirt tracked from site onto public highway. Cleaning taking place.

EPR Compliance Assessment Report

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CAR_NRW0032478**

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Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ
Operator/Permit holder	World Care (wales) Ltd	Date	06/11/2017

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			
B1	C3	Maintain all site surfaces in line with permit condition 2.1	31/01/2018

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.