

Compliance Assessment Report

Report ID:
CAR_NRW0026597

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	02/11/2016	Time in	10:05	Out	11:30
Assessment type	Audit				
Parts of the permit assessed	As below				
Lead officer's name	Thomas, Rhys				
Accompanied by					
Recipient's name/position	Lee Jones/ TCM	Date issued	06/01/2017		

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	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	1.1.4; 1.1.6
D1 - Incident Management - Site security	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	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3	6.2.2

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	2	Total compliance score (see section 5 for scoring scheme)	8
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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-arranged site inspection and part audit carried out by Environment Officer Rhys Thomas. Purpose of the part audit was to look into the production of trommel fines including treatment, categorisation and disposal routes.

Production of trommel fines:

The site mainly receives skips of mixed construction and demolition wastes (EWC 170904). These are tipped onto the sorting yard where the material is pre-sorted to remove large bulky items and any oversized material. The remaining material is fed into a hopper which passes through to the trommel. The trommel contains a 20mm screen from which the fines pass through. The fines drop into a bay beneath the trommel and are then stockpiled in a bay next to the site entrance.

Classification:

All trommel fines produced on site are classified under EWC Code 191212 – 'Other wastes including mixtures of materials from mechanical treatment of wastes other than those mentioned in 191211'. The treatment process which results in the production of fines on site remains consistent in that it is always produced from a mixed waste source. The fines are not mixed with any other material on site. Testing has taken place on the material approximately 18 months ago. Results of the Waste Acceptance Criteria (WAC) testing was not available during the audit. Operator stated that the results confirmed the status of the material as inert. Please forward a copy of the WAC testing results to Natural Resources Wales.

Disposal:

Trommel fines are currently being removed to one inert landfill site. Waste transfer notes for all recent removal of trommel fines were viewed during the audit. The site currently remove an average of one load (16 tonnes) of fines a day. Recent waste return records have not been submitted and therefore could not be used during the audit, however tonnages for monthly and quarterly removal of fines to landfill were available during the audit. These indicated approximately 400 tonnes a quarter is removed.

Site inspection:

During the inspection the following non-compliance with permit conditions have been noted:

C4 General Management – Storage, Handling, Labelling and Segregation. Permit Condition 1.1.6 CCS Score C3.

Permit condition 1.1.6 states that the operator shall manage and operate activities in accordance with a written management system. Operating procedures set out in the management system, particularly relating to waste storage capacity, are not being implemented. As is stated in the site's management system - if the site capacity is reached (what can be stored within bays and containers), then no further wastes will be tipped until waste can be removed from site. This has been identified as a root cause to the waste storage non-compliance identified in this report.

Action: Ensure all staff are familiar with permit conditions and operating procedures set out in the management system.

C4 General Management – Storage, Handling, Labelling and Segregation. Permit Condition 1.1.4 (table 1.1) CCS Score C3.

During the inspection it was noted that large amounts of waste material is not being stored appropriately within skips and bays as is specified within table 1.1 of the permit. Most notably there is a large amount of mixed waste material and inert material stockpiled on site that are not contained within a bay or skip. Mixed waste, inert material and plasterboard are all overflowing and mixing with other waste streams. If wastes are overflowing from bays then other containment should be sought to ensure that wastes are fully contained.

Action: Ensure that all wastes on site are stored within designated bays and skips as specified within the permit. Any excess waste should be removed to a suitably permitted facility.

G4 Monitoring and Records - Reporting and notification. Permit condition 6.2.2 CCS Score C3.

Permit condition 6.2.2 states that a summary record of waste types accepted and removed shall be made for each quarter and shall be submitted within one month following the end of each quarter. As has previously been advised, several waste returns have not been submitted to Natural Resources Wales. The following waste returns are all overdue:

- Quarter 2 (April – June) 2015
- Quarter 3 (July - September) 2015
- Quarter 4 (October – December) 2015
- Quarter 1 (January – March) 2016
- Quarter 2 (April – June) 2016
- Quarter 3 (July – August) 2016

Action: Please ensure that all outstanding returns are submitted to Natural Resources Wales by 9th December 2016. When submitting the returns please ensure that version 7.2 of the Natural Resources Wales waste returns spreadsheet is used. Completed returns should be e-mailed to waste.retruns@naturalresourceswales.gov.uk

Please ensure that you take note of the actions required and date for completion. **Failure to comply with these permit requirements could lead to further enforcement action being taken.**

Observations:

During the site inspection the trommel fines stockpiled on site were viewed. Some contamination was visible in the material such as; glass, plastic, polystyrene and metal. The operator talked through the trommel and picking line waste sorting processes and some of the outputs were viewed in the designated bays. This was not operational at time of inspection.

As is mentioned above there was a large amount of mixed waste stockpiled on site due to be fed through the trommel. There was also a large amount of inert material stockpiled on site. Operator explained that there have been problems with the crusher on site and that this is due to be replaced. The wood storage bay was full at time of inspection and excess wood was being appropriately stored in a separate container.

Site surfaces were in relatively good condition and were free from any standing water. Operations on site were not causing any amenity issues relating to dust, odour or noise at time of inspection.

The plot next to the permitted site is currently being used to stockpile certain wastes under relevant waste exemptions. These include; green waste, processed wood, inert material, plastics, and glass. You must ensure that the conditions relating to storage limits and storage times with these exemptions are complied with. Failure to comply with these exemptions could result in them being de-registered.

Operator discussed intentions to apply for a permit variation to extend the permit boundary and increase the annual throughput. Guidance has been provided regarding which application forms to complete. As mentioned during the visit, a variation application to increase the annual throughput of the site will require a Fire Prevention Plan to be submitted. A Fire Prevention Plan guidance document was provided during the visit.

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

Photographs:

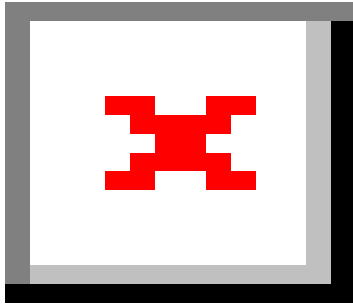


Photo 1: Trommel fines stockpile

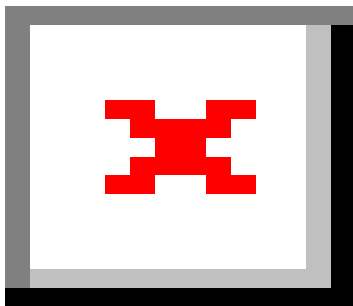


Photo 2: Mixed waste not stored within bays or skips.

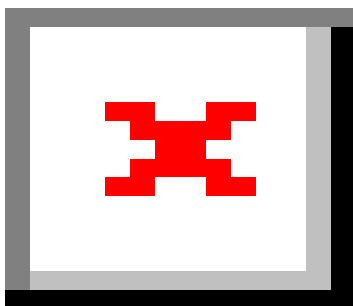


Photo 3: Inert material and mixed waste not contained within bays or skips.

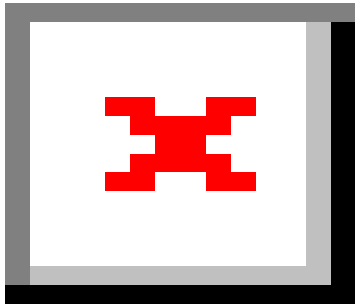


Photo 4: Plasterboard and inert material not appropriately contained and mixing.

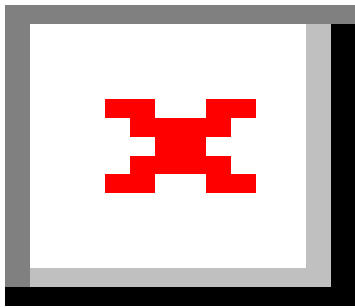


Photo 5: Wood storage bay.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0026597**

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Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ
Operator/Permit holder	World Care (wales) Ltd	Date	02/11/2016

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			
G4	C3	Please ensure that all outstanding returns are submitted to Natural Resources Wales by 9th December 2016.	09/12/2016
C4	C3	Ensure that all wastes on site are stored within designated bays and skips as specified within the permit. Any excess waste should be removed to a suitably permitted facility. Ensure all staff are familiar with permit conditions and operating procedures set out in the management system.	16/12/2016

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.