

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

Site	Unit 12F	Permit Ref	AB3296HT		
Operator/Permit holder	Install Waste management Limited				
Regime	Waste Operations				
Date of assessment	12/02/2019	Time in	13:30	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	All				
Lead officer's name	Lee, Jonathan				
Accompanied by	Sharp, Emma				
Recipient's name/position	Dean Horgan/ Director / TCM	Date issued	21/02/2019		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	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	C4	2.1.1
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	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	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)	0.1
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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

Compliance Assessment Report – Install Waste Management

Officers Jonathan LEE and Emma SHARP in attendance of Install Waste Management, Barry at 13:30pm on the 12th February 2019 to complete an audit of the bespoke non-hazardous waste permit EPR-AB3296HT. Weather dry and mild. Director / TCM of Install Waste Management Limited, Dean Horgan accompanied officers during the audit. The visit consisted of a visual inspection of the site and a desk-based review of site management paperwork.

Previous Compliance Inspection

The previous site inspection was completed on the 13th September 2018. The actions required from this previous inspection are given in the table 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			
G4	C4	Please submit outstanding waste return information	31/10/2018
C4	X	Please ensure that all waste is stored and treated within a building as per Table S1.1 of your permit	21/01/2019
C2	X	Please submit a fire prevention plan to NRW.	21/01/2019

Compliance – The following compliance categories were inspected as part of this audit.

Site Management

Permit condition 1.1.1 (a) states that 'the operator shall manage and operator the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the operator as a result of complaints'.

The site Environmental Management System (dated September 2018) has been reviewed and assessed as part of this compliance audit. This document is comprehensive and specific to the site and its activities. It

is now essential that the site is managed in line with this document, as this will be assessed during future compliance visits.

It should be noted that it is important to review this document on a regular basis, should any changes in site management or infrastructure arise.

Technical Competency

Permit condition 1.1.4 requires the operator 'to comply with an approved competence scheme'.

Site TCM Dean Horgan was able to confirm that a suitable WAMITAB qualification for the non-hazardous treatment and transfer of waste had been taken and provided certification as evidence. This confirms compliance with permit condition 1.1.4.

Site Infrastructure and Activities

Permit condition 2.1.1 states that 'the operator is only authorised to carry out the activities specified in Schedule 1 Table S1.1'. Table S1.1. states condition limits to the permitted activities and stipulates infrastructure requirements. Table S1.1 states that 'all waste must be stored and treated within a building'.

All loose waste (before onward transfer) was seen to be stored in the building. However, during the inspection it was observed that several roll-on/roll-off skips were being stored outside of the building on site. This external area did benefit from an impermeable surface; however, no building has been constructed to store waste on this portion of the site. Skips stored externally containing waste were stated as being in transit and not kept outdoors for extensive periods of time by the operator. An action to not store skips containing waste outside of the building was noted on the previous site inspection on the 13th September 2018.

Given that an action has been previously raised, a **Category 4 breach** has now been scored against permit condition 2.1.1 under 'C4 Storage, handling, labelling and segregation'.

Action: Please ensure that all waste, including those stored within containers or skips, is stored within a building.

If action is not taken regarding this compliance breach, there is potential for an escalation in the level of breach recorded during future compliance visits.

Fire Prevention and Mitigation Plan (FPMP)

Permit condition 3.5.1 requires the operator to 'manage and operate activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance'.

This requirement was discussed in length during the compliance audit, and a site FPMP document was presented for review and assessment by the operator.

The site FPMP document (dated 25th September 2018) has been reviewed against version 2 of NRW's FPMP Guidance (GN16) as part of this compliance audit. A review of this document has indicated compliance with 'Section 12 Waste stored within a building' of the current guidance document. It should be noted that the current guidance document is due to be reviewed by NRW in August 2019. If any amendments are made to this guidance, you will be required to update your FPMP.

Waste Returns

Previously outstanding waste returns have been submitted, thank you for acting to resolve this previous non-compliance. Returns are now being submitted accurately and on time, it should be noted that the operator had recently installed a weighbridge to improve site operations.

Summary

Thank you for your time.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Jonathan Lee on 0300 065 3908, or via email at jonathan.lee@naturalresourceswales.gov.uk

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

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034705**

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

Site	Unit 12F	Permit Ref	AB3296HT
Operator/Permit holder	Install Waste management Limited	Date	12/02/2019

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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	C4	Ensure that all waste is stored and treated within a building as per Table S1.1 of your permit.	01/04/2019

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.