

Compliance Assessment Report

Report ID:
CAR_NRW0032906

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

Site	Ewloe Waste Transfer Station	Permit Ref	BP3797SZ		
Operator/Permit holder	Thorncliffe Building Supplies Ltd				
Regime	Waste Operations				
Date of assessment	25/01/2018	Time in	12:05	Out	12:50
Assessment type	Site Inspection				
Parts of the permit assessed	Permitted Area				
Lead officer's name	Sowerby, Andrew R.				
Accompanied by	Moscrop, Caroline				
Recipient's name/position	Dan Harper/ Site Manager	Date issued	16/02/2018		

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	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
E2 - Emissions - Land and groundwater	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	

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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

The site inspection was not pre-arranged. I was accompanied by Team Leader Caroline Moscrop during the site inspection.

We met Dan Harper who accompanied us around the site. The first observations were that all the mixed waste has now been moved into the new building and that there are new concreted roads on site. There were also no seagulls observed anywhere in the area.

The old household waste area is now being used as a reception area for customers to deposit waste in. The waste is then moved to the most appropriate area on site. The building in this area is now used to store waste window frames, plasterboard, some wood and soil.

The new road system was discussed and we were informed that the wheel wash has now been removed and will be relocated to a new more suitable area on site. The comment was made that there may need to be a good water supply to manage dust on these surfaces when the drier weather arrives, especially when the vehicles are moving on and off the concrete roads to deposit and collect inert materials. However, this can be assessed at the time.

Whilst the household mixed waste is now being deposited and treated within the new building, the new building is still not complete. The reception hall still needs to be constructed and there are parts of the main building that still need to be completed. There is also some more concreting work to be done on site.

Mixed household waste is now deposited, treated and stored within the building before being loaded up and taken away. The treatment of fines is also undertaken in the building using the treatment plant that was previously located in front of the trade waste building.

Fines treatment was discussed during the site inspection. The fines treatment plant produces a rdf fraction, a rubble fraction that is sent to the Abergele site and a "soil" fraction which is coded 19 12 09 (Minerals(for example sands and stones))and sent to the permitted site Wellbecks in Mansfield. We have some concerns around the coding of the "soil" fraction but will feedback on this in due course.

We also discussed the wood processing area. We were informed that the wood dust issues had been addressed following some further tweaking of the plant. However, we still have concerns with runoff from this area of the site and observations made around the outside of the site have shown that runoff is escaping the yard. This needs to be addressed as there should be no uncontrolled discharges of this nature from the site. Failure to get these discharges controlled will result in breaches of the permit.

Now that the main building work on site is complete there should be no more instances of mixed waste being found outside. All such instances will be recorded as a breach. To ensure you are fully aware of what can and cannot be stored and treated outside a building or on impermeable surfaces you should read through Schedule 1 of your environmental permit.

During the site inspection the comment was made that since moving waste into the building the numbers of seagulls in the area seem to have significantly decreased. The site ensures that the doors on the building are closed every evening and at weekends when waste is being accepted.

Overall, despite the ongoing construction work on site everything seemed to be tidy and well organised and Im looking forward to seeing the site once all the improvements have been completed.

If you have any questions or comments regarding anything mentioned above please contact me.

EPR Compliance Assessment Report

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Operator/Permit holder	Thornccliffe Building Supplies Ltd	Date	25/01/2018

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			

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.