

Compliance Assessment Report CAR_NRW0039588

Permit being assessed: MB3193HZ.

For: Stiens Skip And Recycling Facility, held by Stiens Haulage Ltd

At: Elba Crescent, Crymlyn Burrows, Swansea, SA1 8QQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 15/03/2022 between 13:30 and 14:30.

Parts of permit assessed: A, B, C, D, F

NRW Lead Officer: David Morgan.

Report sent to: Craig Stiens, Technical Competent Manager on 21/03/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	C4 No impact	1.1.3
C3 - General Management - Materials acceptance	Assessed (A)	
D1 - Incident Management - Site security	Action only (X)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
B1	Reinstate boundary fencing to prevent escape of waste from site	02/09/2022
C2	Ensure copies of the Environmental Permit, Environment Management System and Fire Prevention and Mitigation Plan are readily available on site	02/09/2022
D1	Boundary fencing is damaged and CCTV is not in operation	02/09/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

A routine site inspection was undertaken on Tuesday 15th March 2022. Present on site during the inspection were: David Morgan (Natural Resources Wales), Craig Stiens (Technical Competent Manager) and Jonathan Stiens (Site Manager).

The following observations were made during the inspection:

Waste Acceptance & Storage

All waste present on site appeared to be in accordance with the list of acceptable wastes in the Environmental Permit. Specified Wastes (namely bricks, stone, concrete) are being crushed and stored outside. It is noted that large volumes of this material is used to maintain the hardstanding surface area of the site.

Steps should be taken to prevent wastes escaping from site. Further detail is recorded below.

Site Boundary & Site Security

An inspection of the site boundary was undertaken. At the rear of the site (upon entering the main entrance), site fencing had fallen down and was covered by overgrown vegetation at the site boundary. At the time of the inspection, it did not appear that any waste had fallen over the boundary and off site. However, this boundary fencing should be reinstated.

ACTION: Reinstate fence at rear of site to prevent activities extending beyond the site boundary (see condition 2.4.1 of the Environmental Permit).

On the rear left side of the site (upon entering through the main entrance), the site borders a property that is owned by a bus company. There is currently no border fencing in this location. It is advised that site security and fencing is reviewed.

Boundary fences not only prevent waste escaping site, but also prevent unauthorised access. At the time of the inspection, the CCTV for the site was also not in operation.

Drainage

Natural Resources Wales' records indicate that the site is served by an interceptor and sealed drainage system (sump). At the time of the inspection the drainage system was

inaccessible. It is likely, that in a future inspection, officers will request to inspect the drainage system. Officers will request these areas are made accessible prior to an inspection taking place.

There was no pooling/standing water on site during the inspection.

Environmental Permit & Environment Management System

Following an inspection of the site, we discussed the Environmental Permit and Environment Management System. While staff appeared to have a good working knowledge of procedures to achieve permit compliance, dealing with incidents & emergencies etc., there was not a copy of the Environmental Permit on site.

A non-compliance was recorded against condition 1.1.3 of the Environmental Permit (Category 4 - No Impact) (Ref:C2)

This non-compliance has been recorded as 'No Impact' as although a breach of the Environmental Permit was recorded, there was no noticeable detrimental impact on the environment. You must ensure a copy of the Environmental Permit is kept on site so staff have convenient access to it.

RECOMMENDATION: It is recommended that some form of in-house training take place to ensure all staff are aware of their responsibilities under the Environmental Permit and Fire Prevention and Mitigation Plan. Staff should have access to the Environment Management System and records of any training should be kept.

Summary

There was no perceived detrimental impact to the environment from operations. Site security should be reviewed and boundary fencing reinstalled accordingly to prevent the escape of waste from site and to improve site security.

You must ensure a copy of the Environmental Permit is on site and it is recommended refresher training takes place so all staff are aware of the permit and procedures.

Thank you for your time during the inspection.

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally,

taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.