

	EPR Compliance Assessment Report	Report ID: 30277/0245086
This form will report compliance with your permit as determined by an NRW officer		
Site	Rhondda Skip Hire	Permit Ref 30277
Operator/ Permit holder	Cwm Rhondda Waste Management Services Ltd	
Date	22/07/2015	Time in 14:00 Out 16:00
What parts of the permit were assessed	Management and Reporting	
Assessment	Audit	EPR Activity: Installation Waste Op X Water Discharge
Recipient's name/position	Andrew Trembeth - Permit Holder	
Officer's name	Adam Ward	Date issued 04/08/2015

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	C3	4.6.1
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	NA	
	2. Energy	NA	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Introduction

Environment Officer Adam Ward attended site to conduct one of the regular compliance inspections required throughout the year. It was also an opportunity to discuss NRW's new waste returns procedure and provide guidance on the requirement of the Waste Regulations 2011 (as amended in 2012) for separate waste collections.

You have informed us that you have a temporary TCM for the site who work for New Tradegar Skips Hire. Please ensure we are provided with a copy of the TCM's WAMITAB award and contact details. The TCM should sign in and out of site and you should keep a record of the work the TCM is completing (e.g. Site inspections and associated compliance work).

Compliance

C4) Management – Storage, Handling, Labelling and Segregation

Permit Condition 4.6.1 – clearly states that solid waste which are likely to produce polluting or contaminating run-off should be stored on impermeable surface and sealed drainage. Further, degradable HCl wastes should also be stored in sealed containers, in covered shelters or in bays.

You are currently storing a number of skips containing mixed waste outside of the impermeable surface. You have therefore been scored a Category 3 breach of Condition 4.6.1.

Waste Returns

Please find attached a copy of the waste returns spreadsheet that is to be used and submitted to NRW on a quarterly basis, showing incoming and outgoing wastes. Waste returns are received and processed by our customer contact centre and they can be contacted on 03000 65 3000 should you need further help. Alternatively if you have any questions please let me know.

Separate Collections

We would like to remind you that since 1st January 2015 waste collection operators including private companies, social enterprises and local authorities are required by statute to provide their customers with separate collections for paper, metal, plastic and glass. This is necessary to improve the quality of recycled material by reducing contamination at the point when the recyclable material is collected.

This applies to wastes from all sources, industry (including construction and demolition), commerce (including retail, hospitality and offices), charities and households. If these four materials are collected comingled, the waste collection operator needs to demonstrate that it has assessed whether the recyclable materials it collects and the outputs from the ensuing sorting process are of the required quality for the receiving reprocessing industries (the "Necessity Test"), and that it is not technically, environmentally and economically practicable (TEEP) for it to collect waste paper, glass, plastics and metals separately.

Once the four waste materials for recycling have been separately collected either through separate collections or a comingled collection followed by the necessary materials sorting process at a Material Facility, the regulations require the materials to be kept separately and not mixed with other wastes or other materials with different properties.

Failure to abide by these requirements does constitute an offence under the Waste Regulations (England and Wales) 2011 as amended. Guidance on the necessity test and the TEEP process is published by Welsh Government http://gov.wales/topics/environmentcountryside/epq/waste_recycling/publication/guidance-on-the-separate-collection-of-waste-paper-metal-plastic-and-glass/?lang=en

If you have any queries regarding any of the issues raised in this CAR form, please do not hesitate to contact Adam Ward on 03000 653149 or via email: adam.ward@naturalresourceswales.gov.uk.

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Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	X
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.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C4	C3	No action specified	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.