

Compliance Assessment Report

Report ID:
CAR_NRW0033261

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

Site	Rhondda Skip Hire	Permit Ref	WP3797ED		
Operator/Permit holder	Cwm Rhondda Waste Management Sevices Ltd				
Regime	Waste Operations				
Date of assessment	26/04/2018	Time in	14:30	Out	15:00
Assessment type	Site Inspection				
Parts of the permit assessed	Management, infrastructure & paperwork				
Lead officer's name	Dearle, Nessa				
Accompanied by					
Recipient's name/position	Susanne Trembath/ Site technically competent manager	Date issued	30/04/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	Condition 2.1.2, table 2.1
C2 - General Management - Management system and operating procedures	C3	Condition 1.1, table 1.1

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

Environment officer Nessa Dearle completed a site inspection on the 26th of April 2018, to assess compliance with the environmental permit. I was shown around site by the sites technically competent manager, Susanne Trembath.

Thank you for taking the time to show me around site. On arrival on site, I was advised that a broken machine had caused problems with waste management on site that week. Excessive amounts of waste had accumulated on site. A plan has been put in place to bring the situation under control, including cease taking in any additional skips until the large volumes of waste have been cleared from site and bringing in a machine to sort and clear the site of excess waste.

I am happy to see that you have taken immediate steps to bring the site back under compliance. However, due to potential pollution risks observed on site two breaches have been scored against your permit for poor waste management. Breaches and advice and guidance are outlined below.

Breaches

B1) Engineering to control emissions, Category 3 breach scored

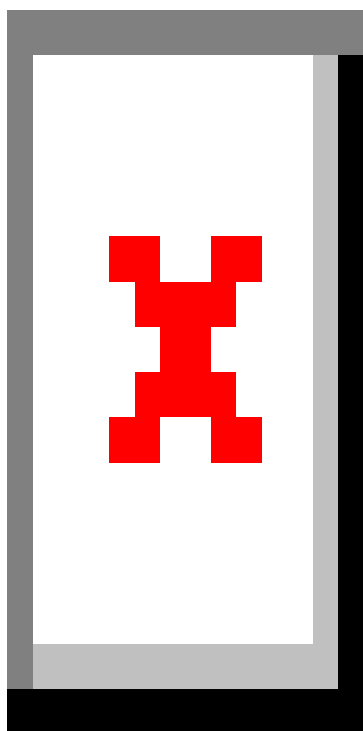
Condition 2.1.2 outlines that "the engineered site containment and drainage systems shall be designed, constructed, inspected, validated and maintained, and shall be fully documented and recorded, to be fit for purpose and to meet the standards specified in table 2.1". Table 2.1 outlines that "Areas of hardstanding shall be constructed of granular materials eg. crushed stone, aggregate, road plannings or other similar material) and maintained such that the working surface:

- i. Shall remain even
- ii. Shall not be subject to settlement of differential settlement
- iii. Shall not be subject to rutting by vehicles even when wet
- iv. Shall have sufficient durability to allow cleaning for example by scraping
- v. Shall remain free of standing water"

The area of hardstanding surface where inert waste is stored on site does not meet the requirements of your permit. The surface in this area of the site consists mainly of mud rather than granular materials and large areas of standing water could be seen.

Action: New materials will need to be laid on this area to improve the quality of the hardstanding surface. These materials must meet the requirements of your permit, as outlined above.

Please ensure that the hardstanding surface is repaired within 1 month of receipt of this form.

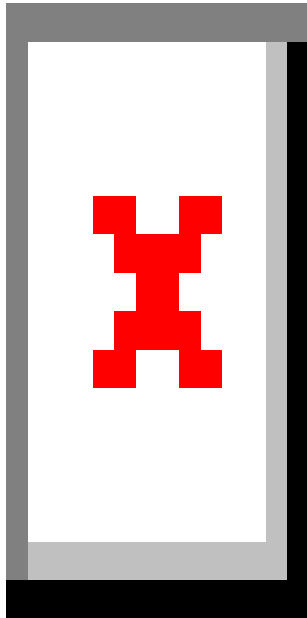


C4) Storage, handling, labelling and segregation, Category 3 breach scored

Condition 1.1 states that “No waste management operations shall be authorised by this licence unless: specified in and undertaken in accordance with the limitations in the following table”. Table 1.1 states that “Wastes shall not be stored in any of the sorting bays within 0.5 from the top of the bay”.

Due to the problems with machinery on site, the levels of waste in the sorting bay were very high. At some parts the height of the waste pile was level or above the height of the surrounding fence. This increases

the risk of waste escaping from site and polluting the surrounding environment.



Action: Please ensure that the waste levels in the sorting bay are reduced as soon as possible Although I appreciate that the breakdown of site machinery has caused issues with waste management on site, it is important to ensure that measures are followed at all times to prevent any waste escaping from site. NRW requests that you clear the excessive waste from site within a week of receipt of this CAR form and ensure that all waste remains within at least 0.5m below of the top of the sorting bay in future. Please also check that no waste from site has escaped site past the back fence during this period. A follow up visit will be completed to check progress with these actions.

Notes

Thank you for providing me with a copy of your updated WAMITAB certificate. I was happy to see that all the sites paperwork was up to date.

On site an area containing spilled paint was seen. Your permit requires all spills to be immediately cleared

using suitable absorbent materials. Waste paint is also not included under your permit. You are only permitted to take in wastes on site that are included in the list of waste codes outlined at the end of your permit. Any unpermitted wastes that may be taken onto site should be placed in a specific quarantine area. Please ensure that all non-permitted wastes are removed from site.

Please let me know once the sites machinery is repaired and when the excess waste has been cleared from site. I will be in contact on your updated email to schedule a follow up visit.
If you have any queries in relation to this form or your permit, please get in contact on the details below.

Nessa Dearle

Tel: 03000653352

Email: nessa.dearle@naturalresourceswales.gov.uk

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033261**

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

Site	Rhondda Skip Hire	Permit Ref	WP3797ED
Operator/Permit holder	Cwm Rhondda Waste Management Services Ltd	Date	26/04/2018

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			
C2	C3	Please ensure that the waste levels in the sorting bay are reduced as soon as possible.	07/05/2018
B1	C3	New materials will need to be laid on this area to improve the quality of the hardstanding surface. This must meet the requirements of your permit as outlined below.	27/05/2018

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.