

	EPR Compliance Assessment Report	Report ID: 30277/0198303			
This form will report compliance with your permit as determined by an NRW officer					
Site	Rhondda Skip Hire		Permit Ref	EPR/WP3797ED EAWML 30277	
Operator/ Permit holder	Cwm Rhondda Waste Management Services Ltd				
Date	15/01/2014		Time in	15:00	Out 15:30
What parts of the permit were assessed	Storage, handling, & pest control,				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Site Manager				
Officer's name	William Powell		Date issued	22/01/2014	

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	C4	2.1.2;
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
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; 1.1.1 (Cat 4)
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	A	
	4. Reporting & notification	N	
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	3	Total compliance score (see section 5 for scoring scheme)	4.2
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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.

Breaches

C4: Management - Storage, Handling, Labelling & Segregation: 1.1.1 table 1.1; Maximum storage area capacity (sorting area, sorting bays, and dedicated sorted recyclable waste in containers: 350m³); Category 4 breach; Too much waste on site

C4: Management - Storage, Handling, Labelling & Segregation: 4.6.1 table 4.6; Degradable Household, Commercial and Industrial wastes only permitted if stored in areas with impermeable pavement; Category 3 breach; Plasterboard and chipped wood tipped on inert waste, which is stored on hardstanding.

B1: Infrastructure - Engineering for Prevention & Control of Emissions: 2.1.2; The engineered site containment and drainage systems shall be [...] maintained, and shall be fully documented and recorded, to be fit for purpose and to meet the standards specified in Table 2.1 – Category 4 breach; The hardstanding surface is uneven allowing significant pooling of water

Waste volume

You're permitted to have in total 350m³ (Including mixed, sorted and inert wastes) on site. I received a complaint regarding the height of the waste in the morning of 15th January 2014. During my inspection that afternoon I found that the mixed waste stored on the concrete pad was slightly higher and slightly longer than before, and there was more rubble than previous visits. This has likely pushed you over the 350m³ threshold. I understand that you have more skips returned around Christmas, and given that you have had two vehicles out of action, which was not foreseeable or due to lack of maintenance, I have downgraded the breach to a category 4 breach. However, leaving large amounts of waste on site, does mean you risk going over your permit limit should equipment or machinery break down.

Please try to keep the waste volume, and particularly the height down, to minimise the impact on local residents. We discussed on site that you would work to reduce the volume, sending out roughly 3 lorries a week. I expect to see the volume of waste decreasing.

Please also note, you have a permit condition requiring 48hr turnover period for degradable wastes (such as house hold rubbish that often is thrown in with the skip). When waste volumes are at this level, it is unlikely you will be able to sort through that waste within 48hrs, risking breaching your permit.

Inert waste

You are allowed to store inert waste off the concrete pad, on the hard standing. Generally the rubble I have seen previously on site, looks visually okay, and likely to be inert. During this inspection however I found that plaster board and wood chippings were stored with the inert waste. These are not inert waste, and should be stored on your concrete pad. Whilst I accept that the plaster board may have been hidden in a skip, this waste should be removed from the inert waste at the earliest available opportunity.

Plasterboard has the potential to degrade and produce toxic and odorous gases, particularly when mixed with biodegradable wastes. There is also a run off risk with storing such wastes here.

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Operator/ Permit	Cwm Rhondda Waste Management Services Ltd	Date	15/01/2014

Section 2 – Compliance Assessment Report Detail continued...

Infrastructure

The hardstanding is still pooling water. This risks concentrating any contaminated runoff into one area. When the weather permits, please level out the hard standing.

Operating hours

I have received reports that you have been operating waste activities outside of your permitted times. I understand that some of these complaints may be related to the plant hire business. I would just remind you that condition 1.3.1 restricts waste operations to
(Monday-Friday: 8 - 5, Saturday: 9 - 2, No waste management operations on Sundays and public holidays).

On a positive note, in general I was impressed with the tidiness of the site, and lack of mud deposits on the road considering the amount of rain we've had recently.

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
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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.	
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We will now consider what enforcement action is appropriate and notify you, referencing this form.	
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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			
B1	C4	Level out hardcore so water does not pool.	ASAP
C4	C3	Remove plasterboard from inert wastes, reduce the volume of waste on site	ASAP

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Name	William Powell	Date	23/01/14
Signature			

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.