

Compliance Assessment Report

Report ID:
CAR_NRW0026329

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

Site	Llanwern Works East	Permit Ref	TP3199FH			
Operator/Permit holder	Corus Strip Products					
Regime	Waste Operations					
Date of assessment	02/09/2016	Time in	10:30	Out	13:00	
Assessment type	Report/Data Review					
Parts of the permit assessed	See below					
Lead officer's name	Ward, Tyrone					
Accompanied by	Willey, David					
Recipient's name/position	Fiona Abbott/ Environment Manager	Date issued	05/09/2016			

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 - Infrastructure - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - Infrastructure - Management system and operating procedures	A	
D1 - Infrastructure - Site security	A	
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
F4 - Infrastructure - Pests/birds and scavengers	A	
F5 - Infrastructure - Deposits on road	A	
G1 - Infrastructure - Monitoring of emissions and environment	A	
G4 - Infrastructure - Reporting and notification to Natural Resources Wales	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

Site inspection

In accordance with e-mail 28/02/14 and CAR ID 0183677 the site is considered definitively closed for the purposes of the Environmental Permitting Regulations and is in aftercare. The updated version of Closure Report ref 525.1/0/0207 will be used during the aftercare period to manage the closed landfill.

Site walkover and inspection of ongoing restoration. The site is being restored in three phases; and this work is expected to be completed over the next few years. The southern part of the site is being restored first.

Inspection of slag blinding layer, geotextile and geomembrane rolls, with discussion on respective handling and placement. This is being done under the agreed CQA Plan. A validation report will be produced which contains details of non-conformances, rejected loads, remedial actions etc.

We reviewed the edge detail for the geomembrane and surface water collection arrangements. Note - surface water all goes to Tata's on-site treatment plant.

Discussed the ADAS evaluation included as an appendix of the Restoration Soil pH Review. The evaluation contains recommended dosing requirements (P, Mg, potash and N) for grass establishment. However, an alternative (and potentially better financial option) could be for a wild seed mix, this will also enhance local biodiversity.

Action – As part of the planning variation, Tata to consider further and please contact NRW for advice.

Inspection of leachate outbreak on eastern flank. A localised seepage has developed which has been attributed to the stripping back of surface vegetation and earthworks in vicinity. The leachate is likely to be perched in nature. A containment bund has been constructed in on order to protect Hundred Perches Reen. We discussed inspection frequencies and actions in event of an overtopping threat (e.g. twice-weekly inspections during dry weather, increased to daily during rain, to pump out leachate and re-distribute etc.)

Action – Tata to confirm procedures as soon as practicable. Regard should also be given to suspended solids from soil stockpiles.

Review of surrounding receptors for amenity issues. No complaints from the landfill site in last 12 months.

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Restoration Soil pH Review – report ref 1546r1v1d0716.

Table 2-1 – where waste soils are being used then DoC procedures will apply, including WTN and LoW codes e.g. 17 05 04, 20 02 02. Rigorous sampling and testing applies as detailed in the documents.

NRW has no objection to the amended specification, provided the Bi soils are only placed in accordance with sections 3.2 and 6 of the report.

This is to be carried out with the associated capping and restoration documents.

The above documents will also form part of the closure variation.

Annual Review of Environmental Monitoring - report ref 1562r1v1d0316.

2015 report received and reviewed. NRW agrees with the proposed monitoring proposals in Tables 12-1 and 12-2, and Actions detailed in section 12.3 of the report.

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EPR Compliance Assessment Report

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Site	Llanwern Works East	Permit Ref	TP3199FH
Operator/Permit holder	Corus Strip Products	Date	02/09/2016

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.

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.