

**This form will report compliance with your permit as determined by an Environment Agency officer**

Site	Rugby Fuel Supplies			Permit Ref	48106		
Operator/ Permit holder	Clews Recycling Limited						
Date	17/10/2019			Time in	11:12	Out	11:45
What parts of the permit were assessed	As marked below						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Clews Recycling Limited						
Officer's name	Katie Henderson, Gerry Pearson, Lydia l'Anson			Date issued	24/10/2019		

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	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
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	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	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	A	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

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**

0

Total compliance score
(see section 5 for scoring scheme)

0

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.

Clews Recycling Limited registered office address is:

10 Ashleigh Close

Barby

Rugby

Warwickshire

CV23 8UG

Company number: 03856771

Clews Recycling Limited site address is:

Unit 17 Hunters Lane Industrial Estate

Rugby

Warwickshire

CV21 1EA

Katie Henderson, Gerry Pearson and Lydia l'Anson visited the site for an unannounced site inspection. The site was previously inspected by both Katie Henderson and Daniel Spasic on 14/03/2019. As photographs were taken, a Code B notice was handed to Brett Sutton, Transport Manager. A selection of these photographs are attached to this form.

A CAR was sent to Clews Recycling Limited in July to highlight that the site had exceeded its permitted annual capacity between April 2018 – March 2019. The purpose of this inspection was to see whether the site were taking measures to reduce waste brought to site in the current year.

Brett showed us around the site in Richard Clew's absence. Richard is the TCM for the site and his WAMITAB certificate expires on 11/03/2021 and was away from the site at meetings during the time of this inspection. Richard phoned and spoke to Katie whilst on site and explained that some contracts have been cancelled to ensure that the quantities of waste can be controlled and the permitted annual capacity is not exceeded in the future.

The site is a transfer station which accepts waste from industrial and commercial sources, and then processes and bales (if applicable) the waste, this process complies with the permit. There are also a number of exemptions on the site, registration number WEX133748, which expire on 04/06/2021. Clews Recycling Limited have a carrier's registration, number CBDU203180 which expires on 08/11/2020.

Waste piles were lower than they previously had been and Brett confirmed that this is due to the site processing the materials at a faster pace. There were no piles over or close to the 3 metre permitted limit.

Brett confirmed that asbestos does not come to site and instead goes straight to the receiving site.

Towards the rear of the site near the baling machine, there is an area of subsidence which the site are aware of. The area will be dug out and concrete slabs will be placed here to prevent further subsidence in the future.

The site ID board is clearly displayed at the site entrance and has the correct information.

There is CCTV on site and a security company are contracted for the site.

There were no amenity issues at the time of the visit. Bay walls were scheduled to be repaired now that the piles have been reduced and the replacement sleepers were on site ready to be used for this purpose. There is a dust suppression system in place to ensure that there are no dust problems.

A random selection of transfer notes were checked on site and there were no problems with these. The site diary was also checked and thoroughly completed daily by Richard as TCM.

Ensure that you submit your quarterly returns for the period 01 July – 30 September by 31 October. Information regarding this can be found at the following: <https://www.gov.uk/guidance/national-operator-waste-returns>.

Photograph 1



Photograph 2



Photograph 3




Photograph 4



Photograph 5



 Environment Agency	EPR Compliance Assessment Report	Report ID: 48106/0344277	
This form will report compliance with your permit as determined by an Environment Agency officer			
Site	Rugby Fuel Supplies	Permit	48106
Operator/ Permit	Clews Recycling Limited	Date	17/10/2019

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.	
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			

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.

● A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

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 Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency 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 Environment Agency 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 Environment Agency 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 28 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 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#) phone their helpline on 0345 015 4033.