Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID:
CAR_NRW0032138

This form will report compliance with your permit as determined by an NRW officer					
Site	Phase 2 Wrexham Recycling Park	Permit Ref	BB3436RA		
Operator/Permit holder	Waste Recycling Limited				
Regime	Installations				
Date of assessment	07/07/2017	Time in	10:30	Out	14:30
Assessment type	Site Inspection				
Parts of the permit assessed	All Below				
Lead officer's name	Ellis, Rhys				
Accompanied by	Sowerby, Andrew R.				
Recipient's name/position	Gary Smith/ Operations Manager	Date issued	27/09/2017		

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	A	
C2 - General Management - Management system and operating procedures	A	
	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	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

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

Regulatory officers Rhys Ellis and Andrew Sowerby met with Garry Smith (operations manager), Keele Mawby (Assistant manager) and Chris Griffiths of FCC. The aim of the audit was to undertake a RDF and Fines audit and general site inspection.

No breaches were noted during the visit.

In summary the aim of the audit was to establish any common industrial practices with regards to RDF and ultimately ensure that all companies in North Wales are producing, storing and classifying RDF appropriately and consistently. The audit was done as one of a number of other similar visits being carried out at targeted permitted sites across North Wales.

Below is a brief summary of what was discussed on site. If there are any questions or comments regarding the information please contact us so that we can ensure the correct information is recorded. The information we received on the day of the visit will be compiled with information received from a number of other 'mini audits' undertaken at other permitted sites across North Wales.

This information will provide a picture of how these waste streams are being dealt with and if there are any common issues that need to be followed up we can decide how these are best dealt with consistently across the area.

Fines

Fines are produced from the waste treatment process.
2 fractions are produced which are 0-20mm and 20-80mm. Composition testing are carried out on the fines and these are sent to Tudor Griffiths in Ellesmere.

The fines are coded as 19 12 12 and a Waste transfer note reference 39668 was provided as an example for the movement of the (0-20mm) material.

In total 4546 tonnes of fines was removed from site last year (Including both fractions mentioned above)

RDF – Refuse Derived Fuel

The main input into the RDF manufacturing process is mixed municipal waste (20 03 01). Apart from receipt of some waste from other authorities, no Commercial and industrial waste is currently accepted on site.

Once the waste has been processed on site it leaves site as loose RDF. RDF is generally sent to a permitted site (EFW) in Ferrybridge Multifuel Energy LTD, Knottingley.

The site also have the option to send to Viridor Waste management, Runcorn. (EFW) and Lincolnshire (FCC Environment).

There is an acceptance specification at the receiving sites for the RDF. Testing is carried out by FCC internally and also by the operator for the receiver site.

RDF sent to Viridor and Multifuel Energy Ltd was sent under E.W.C code 19 12.12 whilst the RDF destined for FCC Environment was sent under E.W.C code 19 12 10.

The operator advised that they would provide an explanation on the use of 2 different E.W.C codes for the RDF. Please can you respond by 10th October 2017.

Operating procedures/Environment management system.

The overall Environment Management procedure was shown to officers during the visit. This is an extensive document and it was agreed that this would be a future aspect for the site to be audited on.
As part of the audit today, sections of the EMS relevant to our discussion today was briefly discussed. Thank you for forwarding the waste acceptance procedures to NRW.
As agreed during the visit please can the site submit a copy of the index for the overall EMS. Please provide this no later than

the 10th October 2017.

Fire prevention plan.

Guidance on Fire prevention plans were discussed during the audit.

The Fire Prevention and Mitigation Plan Guidance – waste management (FPMP) was published in July 2017. This guidance replaces the Natural Resources Wales Fire Prevention and Mitigation Plan Guidance – Waste Version 1 , May 2016.
Natural Resources Wales have a member of the NWFRS on a secondment. This will be a good opportunity to review the current Fire Prevention Plan. As part of this we will review the EMS procedures you may have in regards to fire prevention, it may be the case that there is additional information in the EMS that is not covered in the Fire Prevention Plan

Dust management.

The operator currently employs 6 cleaners for dust and general cleanliness on site. The site is proposing to install a dust hoovering extraction system inside which will increase the cleaning efficiency and overall health and safety. Please can you keep Natural Resources Wales updated on this matter.

Biofilter Media and biofilter odour report.

It was explained to officers that the biofilter media for the MBT is due to be replaced early next year. It is re-assuring to hear that this work is planned, as there seems to be a downwards trend in performance of the bio filter as of late. For example there was a biofilter efficiency result of 88% in the 27/05/2016 report whilst in a report dated 07/02/2017 efficiency was down to 71%.

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Operator/Permit holder	Waste Recycling Limited	Date	07/07/2017

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			

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.