

## Compliance Assessment Report

Report ID:  
CAR\_NRW0027080

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           | 31/12/2016                     | Time in     | N/A        | Out | N/A |
| Assessment type              | Check Monitoring/Sampling      |             |            |     |     |
| Parts of the permit assessed | All Below                      |             |            |     |     |
| Lead officer's name          | Ellis, Rhys                    |             |            |     |     |
| Accompanied by               |                                |             |            |     |     |
| Recipient's name/position    | Gary Smith/ Operations Manager | Date issued | 07/02/2017 |     |     |

### 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 |
|-----------------------------------------------------------------------------|--------------|-----------------------|
| E1 - Infrastructure - Air                                                   | 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.

|                                    |          |                                                                     |          |
|------------------------------------|----------|---------------------------------------------------------------------|----------|
| <b>Number of breaches recorded</b> | <b>0</b> | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | <b>0</b> |
|------------------------------------|----------|---------------------------------------------------------------------|----------|

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

### E1) Emissions to air

#### G1 –Monitoring of emissions and environment

Thank you for submitting your bioaerosol monitoring results in accordance with section 3.7 of your permit. The monitoring was undertaken on the 1st December 2016.

In summary your reports concludes that Mesophilic bacteria, *Aspergillus fumigatus* and Gram negative bacteria were calculated below EA guidance levels for composting processes at the upwind and downwind perimeters of the MBT facility and at the Southwest perimeter of the HWRC. The HWRC was upwind of the MBT buildings throughout the assessment.

A subsequent meeting has occurred between the operator, the consultant and Natural Resources Wales to discuss current sampling methodology and strategy and comments and recommendations raised from the audit of previous monitoring results. The outcomes of these discussions were highlighted in CAR reference CAR\_NRW0024796.

#### G4) Reporting and notifications

Thank you for submitting your waste returns for all 2016 quarters in line with permit condition 4.2.5.  
The below observations were made. Please can site provide further information?

Quarter 2 – Waste returns show that 1461.44 tonnes of 20 03 01 material (mixed municipal waste) was removed from site and was sent to Halton authority for incineration. Is this correct or an input error, please can you provide an explanation.  
Your waste returns demonstrate that 5.6 tonnes of 20 02 01 (biodegradable waste) was removed from site and sent for composting. Is this correct or an input error, please can you provide an explanation.

Quarter 3– Waste returns show that 1894.16 tonnes of 20 03 01 material (mixed municipal waste) was removed from site and was sent to Halton authority for incineration. Is this correct or an input error, please can you provide an explanation.  
Your waste returns demonstrate that 5.6 tonnes of 20 02 01 (biodegradable waste) was removed from site and sent for composting. Is this correct or an input error, please can you provide an explanation. This is the exact quantity as above.

Quarter 4 –  
Waste returns show that 1107.74 tonnes of 20 03 01 material (mixed municipal waste) was removed from site and was sent to Halton authority for incineration. Is this correct or an input error, please can you provide an explanation.  
Your waste returns demonstrate that 9 tonnes of 20 02 01 (biodegradable waste) was removed from site and sent for composting. Is this correct or an input error, please can you provide an explanation. This is the exact quantity as above.

#### All Quarters

General observation there are description of waste and waste collection authority source confirmed as 'yes' and biodegradable tab completed but no tonnage allocated . Is this correct?

## EPR Compliance Assessment Report

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|                        |                                |            |            |
|------------------------|--------------------------------|------------|------------|
| Site                   | Phase 2 Wrexham Recycling Park | Permit Ref | BB3436RA   |
| Operator/Permit holder | Waste Recycling Limited        | Date       | 31/12/2016 |

### 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.

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](mailto: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.