

Compliance Assessment Report CAR_NRW0039900

Permit being assessed: AB3894FE.

For: C A D Recycling Ltd, held by C A D Recycling Limited

At: C A D Recycling, Spencer Trading Estate, Rhyl Road, Denbigh, Denbighshire, LL16 5TQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 10/05/2022 between 11:35 and 12:10.

Parts of permit assessed: Specified by permit

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Tommy Sykes, Site Manager on 13/05/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
C3 - General Management - Materials acceptance	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C1	Provide the Continued Competency certificate for the site TCM once the course has been passed. Ensure NRW are informed of any changes or delays in renewing the certificate for the TCM	10/06/2022
C2	Review the site EMS to ensure it accurately reflects the current operations	30/06/2022
C4	Confirm which waste exemptions are required for the site	20/05/2022
C3	Review the waste classification guidance to ensure the correct waste codes are used	30/06/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was an unannounced site inspection by Hazardous Waste Regulation Officer, Kathryn Bradshaw. The weather on the day of inspection was dry and windy. The site was well maintained with good security.

I was met on site by the site manager, Tommy Sykes who requested I sign in. I requested a tour of the site and explanation of the site operations as it was my first visit. The site is currently undergoing a transition after losing the Denbighshire Council contract so there were some wastes, such as paints that were yet to be removed off site and some containers that were no longer being used

The site accepts mattresses from household recycling sites which are dismantled and the different materials segregated for onward recycling or disposal. All the mattress processing takes place inside a building. Some baled materials are stored outside and other material is stored inside another building before they are removed off site.

Building where mattresses are processed



The site accepts commercial waste in skips and wheelie bins. This waste is tipped and processed inside a building unless the waste is all inert materials which are tipped directly into a bay outside.

Building where wastes are segregated and processed



Inert material storage



An area of the site contained some hazardous wastes (paints, fluorescent tubes) located at the far end of the yard. These wastes are what were left over from the household recycling sites and are due to be collected. According to the site EMS and site plan these wastes should be stored in Unit 6 as these wastes are stored under the S2 exemption that is registered for the site and are to be kept separate from the permitted waste operation.

As the site is undergoing some changes and transitions it would be of benefit to review the site EMS and associated plans to ensure it accurately reflects the current operations and waste storage.

Paint and fluorescent tube waste



Outside Unit 6 were a number of fridges and freezers which had just been delivered and were waiting to be moved inside the building. Please ensure these wastes are stored inside the designated building.

Fridges & freezers outside Unit 6



According to our public register records the site has the following waste exemptions registered under reference NRW-WME070140:

- S1 - Storage of Waste in Secure Containers (Non-agricultural)
- S2 - Storage of Waste in a Secure Place (Non-agricultural)
- T10 - Sorting mixed waste (Non-agricultural)
- T12 - Manual Treatment of Waste (Non-agricultural)
- T9 - Recovery of scrap Metal (Non-agricultural)

Can you confirm if all of these exemptions are required as you now have a standard rules permit? They were registered on 11/01/2022 and due to expire on 11/01/2025.

The Continued Competence Certificate for the site's TCM, Tommy Sykes expired at the end of March 2022 but due to problems with providing photo i.d. the next course he is booked on starts on 07/06/2022.

If for any reason the course is not completed on this date, a suitably qualified TCM would have to be appointed to cover until the course was completed and passed. Please ensure you provide NRW with any updates in relation to this including forwarding your completion certificate.

The waste returns that have been submitted since 2018 have been reviewed. On the waste received the code 20 01 99 has been used but with other codes used in the description, an example is shown below from the Q3 2021 returns:

Denbighshire	200199	Other fractions waste not R13 Temporary storage of wastes pending any otherwise specified. other recovery operation (excluding temporary DMR and Glass bottles storage, pending collection, on the site where it 200101,200102,200140. produced).
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The code 20 01 99 is not allowed on your permit. Please review your waste coding to ensure you use the most suitable waste code. The link to the waste classification guidance is below:

[Waste classification technical guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-classification-technical-guidance)

Thank you for your time during the site inspection.

My contact details are below if you have any questions or updates on the site.

Kind Regards,

Kathryn Bradshaw

Swyddog Rheoleiddio Gwastraff Peryglus (GD)/ Hazardous Waste Regulation Officer (NE)

Cyfoeth Naturiol Cymru/ Natural Resources Wales

Ffôn/ Phone: 03000 65 5191

Ffordd Caer, Bwcle. Sir Fflint. CH7 3AJ / Chester Road, Buckley. Flintshire. CH7 3AJ

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.