

Compliance Assessment Report CAR_NRW0040024

Permit being assessed: UP3794FZ.

For: Worldcare Wales Ltd, held by World Care (wales) Ltd

At: Worldcare Wales Ltd, Llandudno Junction, Conwy, LL31 9PN.

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

On 19/05/2022 between 11:00 and 11:50.

Parts of permit assessed: The CAR sub criteria listed below

NRW Lead Officer: Cathrine Kiely, accompanied by Donna Muirhead.

Report sent to: Lee Jones, site TCM/Director on 15/06/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F5 - Amenity - Deposits on road	Assessed (A)	
C3 - General Management - Materials acceptance	C3 Minor	1.1.4
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	4.6
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	6.2.2
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	C4 No impact	6.3.1
C2 - General Management - Management system and operating procedures	C4 No impact	1.1.6

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

Total number of non-compliances recorded	Total non-compliance score
5	8.3

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
C3	Ensure the volume of waste is reduced and contained within the bays as specified by the permit.	04/07/2022
C4	Wastes with specific properties were not being stored in accordance with the permit. Ensure these are moved so compliance with the permit can be achieved.	20/06/2022
G4	A summary record, including nil returns, of the waste types	04/07/2022

Criteria	Action needed	Complete by
	accepted shall be made for each quarter and shall be submitted to the agency within 1 month following the end of each quarter	
G2	Ensure a site diary is kept and used daily	20/06/2022
C2	Ensure the FPMP is updated to reflect any changed in waste storage areas on site	04/07/2022

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 site inspection was carried out on Thursday 19th May 2022 by Natural Resources Wales officers Cathrine Kiely (Senior Officer, Waste Regulation) and Donna Muirhead (Officer, Waste Regulation)

Weather conditions throughout the inspection was dry and cloudy.

Officers were met on site by Lee Jones (director/TCM) and were shown to the site offices for brief discussions prior to inspection. The site was open and there was a lot of activity on site. The trommel and picking line were not operational however site operatives were actively segregating waste on the yard.

Due to the amount of waste on the yard officers could not walk much further past the entrance to the site for health and safety reasons and photos were taken from where officers were stood.

(F5) Deposits on the road

On a whole the highway was clear of mud and debris tracked off site however there was some evidence of mud which had collected by the kerbs and effort could have been made to tidy this up. This was pointed out to you at the time.

Non - compliances

(C3) Materials acceptance - Permit condition 1.1.4 Compliance Classification Scheme Category 3 breach.

Stockpiles of waste wood, and general mixed household waste could be seen on the yard and quantities were in excess of what could be stored in the bays. This is contrary to what is stated in condition 1.1.4, table 1.1 "Maximum storage capacity of the site shall not exceed that which can be contained within skips and bays constructed in accordance with conditions in section 2.1". It was not possible to ascertain the exact quantity of waste wood which was stored on the yard as it was unsafe to do so. Generally, the volume of waste stored on site is concerning. Storing the waste wood in these large quantities poses a fire risk at the site which could pose a significant risk of smoke pollution affecting the nearby highway the A55 as well as the risk of contaminated fire water entering nearby

watercourses. Ensure the quantity of waste on site is reduced and taken to a facility which is suitably permitted by **04/07/2022**.



C4 - Storage, handling labelling and segregation. Permit condition 4.6.1 Compliance Classification Scheme Category 3 breach.

There were several batteries which were stockpiled in the open and not stored within the container located next to them. Permit condition 4.6.1 refers to table 6 which states that hazardous waste "shall only be stored in sealed containers within a secure hazardous store". Ensure that these waste types are stored in the appropriate way as specified in table 4.6 of the permit.



G4 Reporting and notification to Natural Resources Wales - Permit condition 6.2.2, Compliance Classification Scheme Category 4 breach.

Waste returns are late as per section 6.2.2 of your permit which states "A summary record, including nil returns, of the waste types accepted shall be made for each quarter and shall be submitted to the agency within 1 month following the end of each quarter". A CAT4 score has been applied for this breach. We have requested Waste Returns to be submitted

in full for Q1,2,3,4 for 2021 and Q1 2022. Please ensure these are received by NRW by no later than **04/07/2022**.

G2 Records of activity, site diary, journals/events - Permit condition 6.3.1, Compliance Classification Scheme Category 4 breach.

During the inspection there was no site diary which could be provided to show officers. You were encouraged to ensure future compliance with the permit by regularly inputting information into the diary as stated in condition 6.3.1 of the permit: "construction work, start and finish of daily waste management activities on site, maintenance, breakdown, emergencies, problems with waste received and action taken, site inspections and consequent actions carried out by the operator, technically competent management attendance on site, despatch of records to the Agency, severe weather conditions, complaints about site operations and actions taken, environmental problems and remedial actions."

C2 Management system and operating procedures -Compliance Classification Scheme Category 4 breach.

Condition 6.3 of the Fire Prevention and Mitigation Plan states "The Plan will be kept under review as it is a live document and as a minimum will be reviewed annually". The site drawing on the FPMP shows soil located on the yard which has now been permanently moved to a different location on site. This change to site storage arrangements should be reflected in the FPMP plans. Ensure these changes to your FPMP are made by no later than **04/07/2022**.

Regards,

Cathrine Kiely

Senior Officer, Waste Regulation NW

cathrine.kiely@cyfoethnaturiolcymru.gov.uk

Please note any reference within the CAR/ permit to the Environment Agency means Natural Resources Wales.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.