

Compliance Assessment Report CAR_NRW0040032

Permit being assessed: CB3593HF.

For: Parry and Evans Ltd, held by Parry And Evans Limited

At: Unit 103, Zone 1, Deeside Industrial Park, Flintshire, CH5 2LR.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number 2204163).

On 16/06/2022 between 10:10 and 11:15.

Parts of permit assessed: 1.1, 3.1, 3.2, 3.5

NRW Lead Officer: Amy Henderson, accompanied by Eleanor Pierce.

Report sent to: Robin Draper, Environmental Manager on 29/06/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	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
F3	Maintain regular litter picks within the yard area to the front of the site to minimise the risk of litter blowing offsite.	13/07/2022

Criteria	Action needed	Complete by
D2	Review site FPMP. Copy to be sent to Regulating Officer.	Already completed

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 a pre-arranged site inspection carried out by Waste Regulation Officer Amy Henderson and Tackling Waste Crime Officer Eleanor Pierce. The visit was carried out in response to a fire which took place on site on the 08/06/2022. The weather at the time of the visit was dry and sunny.

On arrival at site NRW Officers met with Lee Evans, Company Director, Robin Draper, Steve Walker and Stephanie Watson, who accompanied Officers throughout the visit. The site was operational at the time with waste arriving and leaving site.

The recent fire on site was discussed, the cause of this is believed to be insulation boards which were being shredded at the time. The site was operational at the time of the fire, the fire was quickly identified and the Fire Prevention and Mitigation Plans (FPMP) put into place. The site now has thermal cameras in place monitoring the temperatures of the waste 24/7. The new system sends an alarm to designated site employees. The thermal imaging cameras also identified the fire. Approximately 20-30 tonnes of waste was involved in the fire, this has already been removed from the site. Due to the issues caused by this waste type, the site has now ceased accepting it. It was requested by Regulating Officers that the sites FPMP is reviewed in light of the fire and any relevant changes implemented. A copy of the updated FPMP should be sent to the Regulating Officer.

Drainage for the yard area is sealed and all fire water was contained. The site is awaiting a contractor to empty the interceptor in the coming days.

No odour was identified on arrival or throughout the site visit. Litter picks were taking place outside of the boundary at the time of the visit. Some litter was seen in the yard area at the front of the site, however no issues were identified outside of the permitted boundary. Advice was given to the site to maintain litter picks in this area to keep on top of this. Since officers last visited, new netting has been put in place along the top of the perimeter fence to prevent litter escaping.

Quantities of waste onsite were higher than seen during previous visits. Availability of transport for onward movements of waste has been limited recently due to circumstances out of the sites control, this has led to an increase in stored quantities. The site explained they were doing what they could to manage this and keeping storage times to a minimum.

The site is having to plan further in advance the vehicles required for onward removal of waste and there can be a delay should extra vehicles be required.

During the visit it was also discussed whether the site needs to register as a Materials Recycling Facility. The site stated they believe they do not fall within this currently. It was advised that the wording on NRW's website has now been updated to ensure the criteria for registration is clearer to assist operators in determining if they need to register.

Following the inspection of the site, the site diary was also checked, this was found to be completed in detail and up to date. This is completed daily.

An updated FPMP was received on 28/06/2022, along with the report compiled following the fire, as requested during the site meeting.

There were no breaches found as a result of this site inspection.

Thank you for your time and cooperation during the visit.

If you have any queries regarding this CAR form please contact
amy.henderson@cyfoethnaturiolcymru.gov.uk

Kind regards

Amy Henderson
Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer
Cyfoeth Naturiol Cymru / Natural Resources Wales
Swyddfa Bwcle / Buckley Office

"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.