

Compliance Assessment Report CAR_NRW0040204

Permit being assessed: TB3397TD.

For: GTR Aggregates and Recycling Limited, held by GTR Aggregates & Recycling Ltd
At: Waste Transfer Station, Dee Bank Industrial Estate, Boot End, Bagillt, Flintshire, CH6 6HJ.

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

On 25/07/2022 between 16:00 and 16:20.

Parts of permit assessed: Waste Storage, Handling, Labelling & Segregation, Site Drainage Engineering, Management System & Operating Procedures

NRW Lead Officer: Sarah Walton, accompanied by Steven White.

Report sent to: Andrew Tabinor, Technically Competent Manager on 02/08/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	Ongoing (O)	1.1.1 (Table 1.1) No more than 2,000 tonnes of untreated inert waste shall be stored at any one time
C2 - General Management - Management system and operating procedures	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	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
C4	Reduce volume of inert waste being stored to less than 2,000 tonnes.	12/08/2022
C2	Submit to NRW, evidence that inert wastes are being treated to WRAP Quality Protocol	12/08/2022
B3	Submit to NRW, a copy of the drainage report completed at site on 23/06/2022, along with any other evidence to demonstrate drainage faults (as noted in CCTV survey October 2021) have been resolved.	12/08/2022

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

On Monday 25th July 2022, Officers from Natural Resources Wales conducted a site inspection. This inspection was carried out following enforcement related activities, which took place on site earlier in the day.

Waste Regulation Officer, Sarah Walton and Senior Waste Regulation Officer, Steven White completed a walk over of site, to check progress and compliance with the Environmental Permitting Regulations, Regulation 37 Suspension Notice, which was issued to site on 21st June 2022.

Officers were not accompanied around site by any staff, but were given authorisation to walk around site, as no operations were taking place at the time of the visit.





Photographs showing the transfer building

The above photos show that the transfer building has been cleared of Household, Commercial and Industrial waste.





Photographs showing the Recycling Building and yard adjacent to the transfer building.

Again, the above photographs evidence the site has removed Household, Commercial and Industrial wastes from site.

Evidence submitted so far by management, shows that the majority of this waste has been moved to A1 Supa Skips Ltd, Unit 37, Lune Industrial Estate, Lancaster, Lancashire, LA1 5QP. According to the Environment Agency's Public Register, this site is currently partially suspended for incoming waste. This is therefore an unlawful movement of waste, as A1 Supa Skips is not currently authorised to accept waste. Officers are awaiting a response from GTR on this matter.

Waste Transfer Notes submitted by GTR do not stipulate waste volumes being moved, so it is difficult to determine how much waste has been removed from site and whether the entirety of transfer notes have been received for all waste removed since 30th March 2022.

As an action, any outstanding Waste Transfer Notes for waste being removed from site, should be submitted to NRW, along with a response regarding waste movement to A1 Supa Skips.

Previous site inspections on 16/06/2022 and 22/06/2022 noted skips of mattresses, window frames, plastics and tyres on site. Please ensure that Waste Transfer Notes for these wastes are included in the response.





Photographs to show inert waste storage

The above photographs evidence the site continues to store above the permit limit of 2,000 tonnes of inert waste.

Whilst on site, officers queried the production of '6F2' and other product from inert waste. It was apparent that staff had limited knowledge in this area and could not provide an explanation of how this standard is met.

As an outstanding action, site should ensure no more than 2,000 tonnes of inert waste is being stored. NRW is also awaiting evidence to show that the site is treating inert waste in line with WRAP Quality Protocol.

Officers queried whether site drainage matters had yet been resolved. Jamie Roberts (Site Manager), arrived on site towards the end of the inspection and produced some hand written drainage reports which appeared to have been completed by an 'NRC Waste Water, Industrial & Emergency Solutions' contractor on site on 23/06/2022. These reports were difficult to read and make sense of. Jamie explained that these reports should have been written up in a more formal capacity and sent to site management.

As an action, please submit to NRW, any drainage reports completed at site since October 2021.

NRW Officers continue to liaise with site management regarding outstanding actions on the permit suspension notice.

Thank you to all staff who assisted officers throughout the visit.

Kind Regards,

Sarah Walton
Waste Regulation Officer
03000 654 791

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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.