

Compliance Assessment Report CAR_NRW0040954

Permit being assessed: DB3231RX.

For: Natural U K Ltd Healthcare Management Facility, held by Natural U K Ltd
At: Unit 3, Capel Hendre Industrial Estate, Capel Hendre, Ammanford, Carmarthenshire,
SA18 3SJ.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 18/01/2023.

Parts of permit assessed: FPMP Review

NRW Lead Officer: Sally Wakeford.

Report sent to: Rhiannon Chapple, Consultant on 18/01/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
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
D2	Update FPMP with required details	18/02/2023

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 19 October 2022, you provided Natural Resources with a Fire Prevention and Mitigation Plan (FPMP). Following a review of your FPMP in accordance with Fire Prevention and Mitigation Plan Guidance – Waste Management Version 2 August 2017 (guidance), I have

the following comments on your plan and the associated updates that are required to the FPMP.

The FPMP guidance sets out what must be in your FPMP, and what should be in your FPMP. The comments have been divided into these sections. For the “must” requirements you are required to include these in your FPMP. For the “should” requirements, please consider these, give alternatives or explain why they may not apply to your operations.

It is noted that CWTS (Clinical Waste Transfer station) waste (area D on drawings) is not included in this plan, due to being excluded from this guidance by nature of it being hazardous. However, the movement of containers away from any fire is noted within this plan.

There is a summary of the “must include” actions at the very end of this report.

Section 5 – Site Plan

Following the review of your site plan it does not contain the following requirements as set out as “musts” in the section of the guidance.

- areas of natural and unmade ground
- location of “off- site” emergency information pack with site plan
- location of key receptors such as critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats, and rivers within 1km of the site (not fully identified)

You must include these requirements in your site plan.

Action: The above requirements of the guidance must be included in a revised FPMP.

Section 6 – Common Causes of fire and preventative measures.

From the information provided within your FPMP, it contains all the requirements set out as “musts” in the Section of the guidance above.

Section 7 – Storage Times and Self combustion Factors

From the information provided within your FPMP, it contains all the requirements set out as “musts” in the Section of the guidance above.

Your FPMP its does not contain the following requirements as set out as “should” in the above section of the guidance.

- demonstrate good stock rotation for all stored materials and show how this is monitored and implemented daily

Action: you should include information above in your FPMP. Where any of these measures have not been included a justification shall be provided as to why it has not been considered or included.

Section 8 – Managing waste material stacks and separation distances

Following the review of your site plan it does not contain the following requirements as set out as “musts” in the above section of the guidance.

- Stack lengths in line with **Graph 1** for general wastes such as RDF, SRF (Refuse derived fuel/solid recovered fuel - various types of fuel derived from wastes using various treatment processes), wood, paper etc.

You must include these requirements in your FPMP.

An email was provided with measurements of 9 x 6.6m x4m (240m³) which need to be added to the FPMP.

Action: The above requirements of the guidance must be included in a revised FPMP.

Section 11 – Enclosing Stacks Using Bays and Walls

Following the review of your FPMP its does not contain the following requirements as set out as “should” in the above section of the guidance.

- Provided evidence of product specification of enclosing bays or walls to ensure appropriate standard of fire resistance have been met.
- Installed fire walls/bays to the manufacturer’s installation requirements

Action: you should include information on the following causes of site and the preventative measures you can take to reduce the risk of fire at your site in your FPMP. Where any of these measures have not been included a justification shall be provided as to why it has not been considered or included.

Section 12 – Waste stored within a building

From the information provided within your FPMP, it contains all the requirements set out as “shoulds” in the Section of the guidance above.

Section 14 – Layout of waste stacks on your site

From the information provided within your FPMP, it contains all the requirements set out as “may need” in the Section of the guidance above.

Section 15 – Seasonality and Waste Stack Management

Following the review of your FPMP is does not contain the following requirements as set out as should in the above section of the guidance.

- Technical assessment that shows you have confidence that your operation will be viable in foreseeable market conditions.

Action: you should include the above information, where any of these measures have not been included a justification shall be provided as to why it had not been considered or included.

Section 16 – Monitoring and Turning of Stacks

Following the review of your FPMP it does not contain the following information in relation to the above section of the guidance as set out as “should”.

- Staff trained to detect and manage hot spots
- Piles are monitored regularly, and temperature increases and changes in moisture content are minimised.
- The equipment they use to detect temperature and moisture content must be capable of operating at any depth throughout the pile.
- They must explain what indicators they will use in relation to temperature and moisture content and the escalation of actions in relation to these indicators.

Action: You shall include information on seasonality and waste stack management. Where any of these measures have not been included a justification shall be provided as to why it has not been considered or included.

Section 17 & 18 – Fire Detection and Fire Suppression Systems

Following the review of your FPMP it does not contain the following information in relation to the above section of the guidance as set out as “should”.

- Decision on what type of system to install – taking into account: FRS unable to enter the building, suppression may not extinguish the fire, water supply to fire system is reliable.

Action: you should include the above information, where any of these measures have not been included a justification shall be provided as to why it had not been considered or included.

Section 19 – Fire Fighting Strategy

Following the review of your FPMP it does not contain the following information in relation to the above section of the guidance. Guidance does not state whether you must have these or need to consider these.

- (suitable) heavy mobile plant you have available that can be used to move waste around the site, for example loaders, excavators, material handlers
- the use of portable water carriers/bowsers can prove to be an essential mechanism to help extinguish fire effected waste
- separating unburned material from the fire using appropriate heavy plant, heavy plant not mentioned, but movement of wheelie bin waste.
- suffocating the fire using soil, sand, crushed brick or gravel

Action: you should include the above information, where any of these measures have not been included a justification shall be provided as to why it had not been considered or included.

Section 20 – Water Supplies

Confirmation has been provided from Mid and West Wales FRS that the hydrants in Capel Hendre Estate are suitable for the stack size noted in the email of 9m x 6.6m x4m (240m3).

From the information provided within your FPMP, it contains all the requirements set out as “musts” in the Section of the guidance above.

Section 21 – Managing Water Run-off

From the information provided within your FPMP, it contains all the requirements set out as “musts” and “shoulds” in the Section of the guidance above.

Section 22 – Designated Quarantine Area

From the information provided within your FPMP, it contains all the requirements set out as “shoulds” in the Section of the guidance above.

Section 23 – During and After an incident

Following the review of your FPMP it does not contain the following requirements as set out as “must” in the above section of the guidance.

- having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses

You must include these requirements in your FPMP.

It is noted there is a list of nearby businesses in the plan, it was discussed via email that this list would be reviewed to ensure it met the 1km distance requirements.

Location of key receptors should also include critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats, and rivers within 1km of the site (these should also be included in the plans).

Action: the above requirements must be included in a revised FPMP.

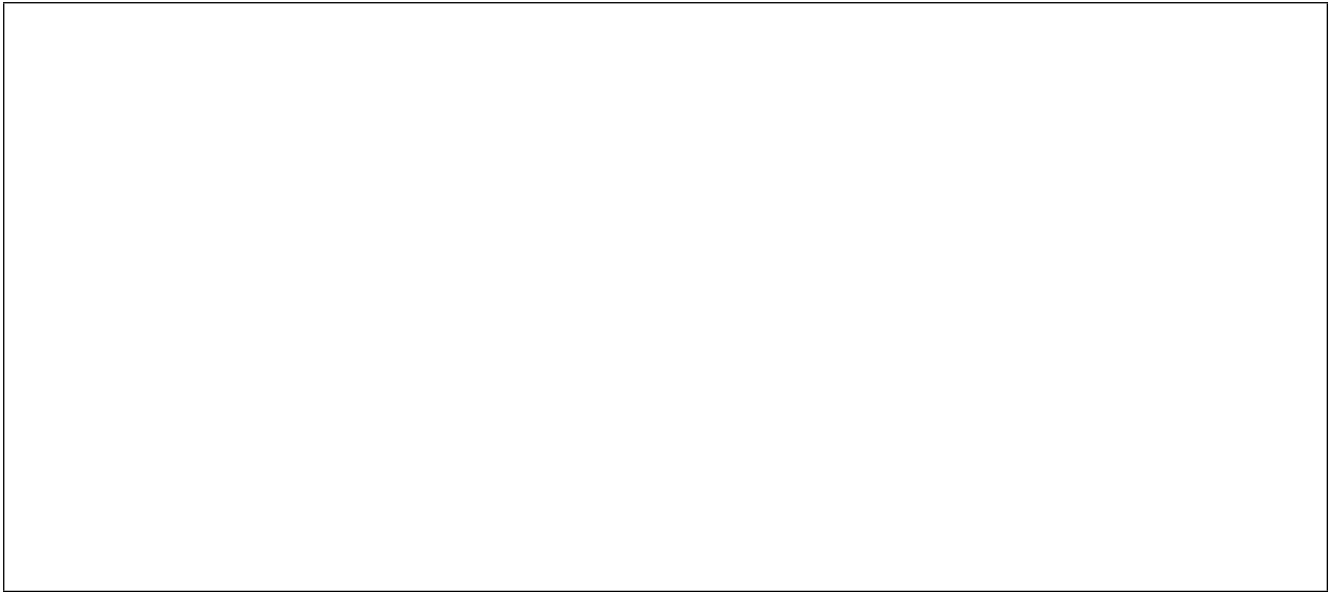
Section 24 – Reviewing and Monitoring your FPMP

From the information provided within your FPMP, it contains all the requirements set out as “should” in the Section of the guidance above.

Summary of “must include”:

- areas of natural and unmade ground on site plan
- location of “off- site” emergency information pack with site plan, marked on site plan
- location of key receptors such as critical infrastructure, schools, hospitals, residential areas, workplaces, protected habitats, and rivers within 1km of the site (not fully identified) marked on site plan
- Stack lengths in line with **Graph 1** for general wastes such as RDF, SRF (Refuse derived fuel/solid recovered fuel - various types of fuel derived from wastes using various treatment processes), wood, paper etc. (9m x 6.6m x 4m)
- having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses

END



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.