

Compliance Assessment Report CAR_NRW0039693

Permit being assessed: ZB3793HN.

For: Dragon Works, held by City Metals (U K) Limited

At: Saltney, Chester, Cheshire, CH4 8RW.

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

On 23/03/2022 between 14:30 and 14:45.

Parts of permit assessed: waste returns, site drainage, storage of waste

NRW Lead Officer: Boguslawka Pierzchala.

Report sent to: Mike Green, owner on 17/02/2023.

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	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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	Please ensure the sawdust used to remove spillages is taken away and disposed off correctly. For immediate action. Could you also use a tarpaulin or similar to cover the floor to prevent the spread of the spillage.	08/04/2022
B3	Please provide an update on when the inspection of the interceptor and the drainage system will take place. Please comply by the 22nd of April 2022	22/04/2022

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**AMENDED CAR FORM DUE TO COMPLETION OF THE ACTION REQUESTED.**

This CAR form is being re-sent to notify you that the suspended score has been removed. Thank you for completing your Waste Returns as requested.

On Wednesday the 23rd of March 2022, a follow up site inspection was conducted at City Metals by Boguslawa Pierzchala, waste regulation officer. The weather conditions were dry and sunny.

Mr Chadwick, site manager, was present throughout the inspection.

The purpose of the visit was to follow up on the actions listed on the previous CAR form, NRW0039432 refers.

Storage of engines/oily parts.

The storage has improved since the last visit. The engines seen during the last visit had been taken away. The officer saw several engines stored in metal containers; some spillage was seen on the concreted area as the containers used for storage don't have bottoms. Sawdust was used to contain the spillage; however, it was not removed.

Action: Please ensure the sawdust used to remove spillages is taken away and disposed off correctly. For immediate action.

Could you also use a tarpaulin or similar to cover the floor to prevent the spread of the spillage.



Metal container with oily parts





Site drainage:

During the officer's last visit a large pool of water was observed by the interceptor clearly indicating that the system is either blocked or full. This time the drainage still showed some signs of a blockage with dark yellow water and oily patches on the surface. Mr Chadwick could not provide an explanation as to what



causes the water to be of that colour.



NRW received a reply from Mr Green, site owner, in which he explained that he had spoken to the landlord in relation to the drainage issue. This seems to be an ongoing situation which affects the site's compliance.

Action: Please provide an update on when the inspection of the interceptor will take place. Please comply by the **22nd of April 2022**.

Waste returns: ACTION COMPLETED.

Condition 7.2.2 of your permit requires you to submit within one month of the end of each quarter a summary of waste quantities and types accepted on to and removed from site for that quarter.

We have received Waste Returns for Q1 2021; however, three quarters: **Q2-Q4 2021** remain outstanding. Please This has subsequently been scored as a C4 breach against the relevant permit condition suspended until the **22nd of April 2022**.

Action: Please submit Q2, Q3 and Q4 2021 waste returns by no later than the **22nd of April 2022**.

Thank you for assisting us with the inspection.

Please find my contact details below.

Kind regards,

Boguslawa Pierzchala Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.pierzchala@naturalresourceswales.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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.