Compliance Assessment Report CAR_NRW0041413

Permit being assessed: AP3694FE.
For: Old Bridge Inn, held by Michael Rolando Scarfo
At: Padeswood, Mold, Flintshire, CH7 4JD.

Type of assessment carried out: Site Inspection, Reason: Routine.
On 22/02/2023 between 14:15 and 14:45.
Parts of permit assessed: Staff Competency, Waste Acceptance, Reporting to Natural Resources Wales, Operating Techniques, General Management

NRW Lead Officer: Sarah Walton.
Report sent to: Michael Scarfo, Permit Holder on 08/03/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Assessed (A)	
C3 - General Management - Materials acceptance	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C2 - General Management - Management system and operating procedures	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
C3	Confirm the following for waste accpeted from Knauf: LoW code, description of the waste and the process the waste has come from. Include copies of Waste Transfer Notes.	17/03/2023
C2	Provide evidence of how '6F2' leaves site ie. Waste Transfer Note / Delivery Note.	17/03/2023
C2	Please provide a copy of site procedures which demonstrate and evidence how inert waste is treated to WRAP Quality	17/03/2023

Criteria	Action needed	Complete by
	Protocol.	

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

A routine site inspection took place on Wednesday 22nd February 2022.

Waste Regulation Officer, Sarah Walton, met on site with Mikey Scarfo. Mikey was overseeing and managing operations taking place on site.

A discussion was had to begin with about how the site had been operating since the previous inspection. Mikey noted that Jessica Scarfo has overhauled the documentation side of the business and had put new processes in place to track waste movements in and out of the site. It was encouraging to hear about these positive changes.

Prior to the site inspection, Waste Returns were reviewed for the year 2022. Thank you for the timely submission of these returns.
Across 2022, the site accepted a total of 54,247 tonnes of waste. The majority of waste codes accepted were 17 codes (Construction & Demolition wastes). The site also accepted 10 11 12 (castings & core mould), 20 02 02 (soil and stone) and 20 03 01 (Mixed Municipal Waste).

Sarah and Mikey conducted a walk around site.



Photograph showing storage of waste from Knauf

Mikey explained that this waste comes in from Knauf. At the time of the inspection it was described as 'MOT Stone'. Mikey was not sure what waste code is assigned to this material.

Waste Transfer Notes were viewed in the office. This waste appears to be coming into site with LoW code 10 11 12 (Waste Glass), but it was not entirely clear as there was no description given on the Waste Transfer Note.

Action: Confirm what this waste is, what process it comes from and what LoW code it is assigned. Please also include evidence of Waste Transfer Notes for this waste.



Photograph showing storage of mixed construction and demolition wastes

In the middle of the site is where the C&D waste is tipped. This waste then goes on to be sorted, crushed and screened.



Photograph showing '6F2' being stored on site
Mikey explained that there is currently a high demand for 6F2 at the moment, meaning there is only a small pile of this on site.

Action: Please can you confirm how '6F2' leaves site and whether this is moved as a waste or a product. In the response, please include examples of documentation that accompanies this material when it leaves site i.e. Waste Transfer Notes / Delivery Notes.

In addition to this, please can you provide a copy of your procedures that demonstrate how the site is treating inert waste to WRAP Quality Protocol.



Photograph showing storage of 'A class' soil
The new waste shed is currently just storing soil. Outside the shed was 'D' class soil. Mikey explained this is graded according to the quality. The soil is screened, analysed and tested to determine the quality.

Following a site walk around, a selection of Waste Transfer Notes were viewed in the site office. It was pleasing to see the site now has more thorough processes in place for waste acceptance.
Some Waste Transfer Notes did not have a description of the incoming wastes. Please ensure that all waste incoming and outgoing is accurately coded and described.

Thank you to staff who assisted during the inspection.

Should you have any queries, please do not hesitate to get in touch.

Kind Regards,

Sarah Walton

Waste Regulation Officer

Email: sarah.l.walton@cyfoethnaturiolcymru.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.