

Compliance Assessment Report CAR_NRW0041595

Permit being assessed: AB3494CM.

For: Llechwedd Quarry, held by Northern Welsh Recycling Ltd

At: Blaenau Ffestiniog, Gwynedd, LL41 3NB.

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

On 27/02/2023 between 12:00 and 13:40.

Parts of permit assessed: As below.

NRW Lead Officer: Leon Williams, accompanied by David Wilby.

Report sent to: Andy Carson, Director on 23/03/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
C3 - General Management - Materials acceptance	Action only (X)	
C3 - General Management - Materials acceptance	C3 Minor	Table 2.2
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	2.4.1
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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
2	8

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	Please ensure that contamination of any incoming waste streams are below 1%.	30/04/2023
C3	Plastic waste to be removed from permitted area.	30/04/2023
C4	Please ensure that all wastes are stored within permitted site boundary.	30/04/2023
G2	Please ensure that all relevant documentation produced in accordance with the WRAP Quality Protocol at Llechwedd are	30/04/2023

Criteria	Action needed	Complete by
	retained for two years.	

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Routine site inspection conducted by NRW Senior Waste Regulation Officer Leon Williams and Waste and Industry Lead Specialist David Wilby.

This was an announced site visit accompanied by company Director, Andy Carson.

The weather conditions were dry and overcast.

(C3) Materials acceptance

Contamination of plastic, wood, textiles and metal within the imported mixed construction and demolition waste streams appeared improved since NRW's previous site inspection on the 1 July 2021.

Some plastics, wood, textiles and metal however remained visible mixed in the waste stream during the inspection.

NRW would recommend that contamination levels of any accepted waste should be at a level of 1% or less. Any waste streams with contamination above this amount should be rejected.

A skip is used to segregate contaminants identified in the waste streams. Please ensure that all contaminants are disposed of at a suitably permitted waste facility and that waste transfer notes are retained for 2 years.



Plastic waste produced from a third party site was stored within the sites permitted boundary.

Plastic waste is not a permitted waste type that can be accepted and stored at this site.

A CCS Category 3 score has been recorded against this non-compliance.

Please ensure that only waste types listed under Table 2.2 of the site permit are accepted at this site.

Steps have been taken to arrange the removal of the plastic waste from site. NRW would be grateful if you could inform us when the clearance has been completed.



(C4) Storage, handling labelling and segregation

Mixtures of stone produced at Llechwedd Quarry and from external site clearance work are

stored in an area outside the permitted site boundary which is defined by permit condition 2.4.1 and Schedule 1 - Site plan.

All waste imported to site must be stored within the permitted boundary.

A CCS Category 3 score has been issued in response to this non-compliance.



(F3) Dust/fibres/particulates and litter

No issues with dust and litter were identified during the inspection.

(G2) Records of activity, site diary/journal/events

The site produces aggregates from inert waste using the WRAP quality protocol.

Please ensure that all produced aggregates are done so to the standards, specifications and quality controls as required by the WRAP quality protocol.

Please also ensure that you keep records that detail which BS EN standards a particular aggregate has been produced in accordance with.

All specified documentation required by the WRAP quality protocol must be kept and retained for a minimum of two years and made available to NRW for inspection if requested.

Soils and clays are not considered to be aggregates under the WRAP quality protocol and the onwards movement of these wastes must be to a site with a relevant environmental permit or exemption.

The onward transfer of soils and clays from your site should also be documented on waste transfer notes.

Additional comments

A discussion was held with regards to moving the sites permitted boundary. A permit variation would need to be submitted to NRW in order to alter the current permitted area.

It is proposed that waste soil from your site is to be used to construct bunds around the perimeter of the permitted waste site. The use of waste soil to construct bunds can be

authorised by the registration of a U1 exemption if the conditions of the exemption are fully complied with.

The quantities of soil stored under the waste permit and used to construct these proposed bunds should be recorded on the relevant quarterly outgoing waste returns and on waste transfer notes.

A discussion was held in relation to permitting a waste recovery operation at Llechwedd. Further information relating to waste recovery permits can be found on NRW's website: [Natural Resources Wales / Depositing waste for recovery](#)

A free 2 hour pre-application advice session is available from NRW, should you wish to discuss this proposal further.

Thank you for your assistance during the inspection.

Please note any reference within the CAR/ permit to the Environment Agency means Natural Resources Wales.

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.