

Compliance Assessment Report CAR_NRW0042494

Permit being assessed: BP3797SZ.

For: Ewloe Waste Transfer Station, held by Thorncliffe Building Supplies Ltd

At: Mold Road, Alltami, Mold, Flintshire, CH7 6LG.

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

On 21/09/2023 between 13:50 and 14:25.

Parts of permit assessed: 1.1.1, 1.1.3, 2.1.1, 3.3, 3.5, 3.6

NRW Lead Officer: Amy Henderson.

Report sent to: Dan Harper, Site Manager/TCM on 29/09/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	2.1.1
D2 - Incident Management - Accidents, emergency and incident planning	Action only (X)	
C1 - General Management - Staff competency/training	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
D1 - Incident Management - Site security	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
1	4

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
B4	Ensure waste within customer tipping area is stored below height of block wall where panels are missing or carry out repairs to panels.	11/10/2023
C4	Ensure all waste required to be stored in a building is stored in compliance with this storage condition.	05/10/2023

Criteria	Action needed	Complete by
D2	Ensure FPMP is updated to include drying floors for product located within the permitted area, and also the storage of baled waste.	27/10/2023

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

This was an unannounced site inspection carried out at the Thorncliffe Alltami site EPR-BP3797SZ. The inspection was carried out by Waste Regulation Officer Amy Henderson. The weather had been dry throughout the day but there was heavy rainfall during the inspection.

During the visit I was accompanied by Laura Forshaw, Site Compliance Manager.

On arrival at site there was no evidence of any issues with litter, odour or pests.

A walk around of the site was carried out. The site was operational and busy with skip wagons and members of the public arriving to deposit waste. The waste quantities on site were deemed to be within the limits on the sites permit/EMS/FPMP. On the whole the site appeared well organised, with waste types being clearly segregated after sorting.

Officers witnessed that some metal sheets to the rear of the storage shed for plasterboard were missing. Although there is a block wall to the rear of this building, the plasterboard was seen to be stored over the height of this wall meaning there was a risk of waste escaping out of the rear of the building into the area of vegetation/trees behind. Laura Forshaw informed regulating Officer that the plasterboard was due to be collected later that day and that the collection had been delayed shortly. **An action has been given to ensure waste is either stored below the height of the block wall or repairs to be made to the metal sheeting.**



Photograph of plasterboard storage shed with missing panels.

The skip sorting shed was busy with several skip wagons waiting to tip and sorting of waste taking place. Despite being busy, waste was contained within the building and quantities were not deemed excessive.

The RDF processing shed was then visited. At the time of the visit a lorry had broken down in this area which was causing some delays. The site seemed to be managing the situation however and were awaiting the removal of the wagon. Quantities of waste in this area were again not deemed excessive despite the delays caused by the broken down wagon.

Following the sites last inspection, drying floors have been installed at the site which are used for the drying of woodchip. Through follow up discussions with Site Manager Dan Harper it was stated that these drying floors are only used for the drying of product and not waste. Should the site wish to use these for the drying of wood chip produced from waste wood, the permit would need to be varied to include this activity. The sites Fire Prevention and Mitigation Plan should be updated to include the drying floors being within the permitted area, as these are an additional source of heat. **This has been listed as an action.**

It was identified that a quantity of trommel fines were being stored within the wood yard area. Under the permit this waste must be stored within a building. This is a breach of permit conditions and is discussed further below.



Photograph of trommel fines being stored out in the open.

There was also some baled waste being stored within the lower wood yard area. Under the

current FPMP which NRW holds for the site, section 6.2.1 states The site does not carry out any baling, therefore consideration of baled stack heights and widths is not required.. The sites FPMP should therefore be updated to include storage of baled waste, taking into consideration stack heights, length of rows etc. **This has been listed as an action.**



Photograph of baled waste being stored onsite.

As a result of the permit inspection, the following permit breaches have been identified.

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities") The following wastes may be stored either outside or within a building; Clean segregated recyclables (consisting of glass, baled paper, plastics, plasterboard) - asbestos - WEEE - Tyres - Wood and green waste. All other waste must be stored within a building.

Under the above condition trommel fines must be stored within a building. During the inspection fines were seen to be being stored out in the open, not in compliance with the above condition. you must ensure this waste is moved to an area within a building. As the area where the fines were being stored does benefit from sealed drainage this has been given CAT 3 non-compliance score.

Actions have also been given for the following;

- Carry out repairs to metal panels of customer tipping shed or ensure waste is stored below the height of block wall.
- Update FPMP to include drying floors and storage of baled waste.

Please provide an updated copy of the sites FPMP with the required changes by 27th October 2023.

Thank you for your time during the site inspection.

Should you have any queries regarding this CAR form please contact amy.henderson@cyfoethnaturiolcymru.gov.uk

Kind regards

Amy Henderson

Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales
Swyddfa Bwcle / Buckley Office

"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.