

## Compliance Assessment Report CAR\_NRW0042542

**Permit being assessed:** NB3339RH.

For: Hafod Yard Transfer Station, held by AMBIPAR Site Services Limited

At: Hafod Road, Johnstown, Wrexham, LL14 6HF.

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

On 26/09/2023 between 14:50 and 15:30.

Parts of permit assessed: 1.1, 2.1, 2.4.2, 3.5, 4.1

**NRW Lead Officer:** Amy Henderson, accompanied by Boguslawa Pierzchala.

**Report sent to:** Janet Edwards, Environmental Officer on 06/10/2023.

### 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)	
C1 - General Management - Staff competency/training	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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	Ensure WEEE items are stored in compliance with the WEEE Directive.	20/10/2023

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 routine site inspection carried out at the AMBIPAR Site Services Ltd Hafod Yard site, EPR-NB3339RH.

The inspection was carried out by Waste Regulation Officers Amy Henderson and Boguslawka Pierzchala. The weather at the time was dry.

On arrival at site Officers were met by Lee Collins, site TCM who accompanied us throughout the inspection.

A copy of the sites permit was kept in the site office and staff were aware of it's location. Officers requested to see the site diary. The site has daily inspection checklists, which were found to be completed in full and up to date.

A walk around of the site was carried out. The site appeared tidy and well organised. Waste quantities were within the permitted limits.

The site drainage was discussed and Officers requested to see the site interceptor. Site employees knew where this was located and where the shut off valve was should they need to isolate the drainage onsite. It was stated the interceptor is emptied approximately every 30days.

Some WEEE/fluorescent light bulbs were seen to be stored out in the open. There was a new box onsite for the storage of fluorescent lightbulbs, however this box only had a small capacity. Advice was given that these should be stored within suitable weather proof containers. Condition 2.4.2 of the permit states the storage and treatment of WEEE shall be carried out in accordance with the technical requirements of Annex VIII of the WEEE directive. Section 3.4.11 of the sites EMS states WEEE accepted onto site will be stored according to the requirements of the WEEE directive, within IBCs which are stored in a curtain sided trailer. An action has been given to ensure the site stores WEEE in compliance with the WEEE directive and as stated in the EMS.



Photograph of WEEE items/Fluorescent tubes not stored in weatherproof containers.

The site had some waste onsite which they had accepted as the result of a recent lorry fire. The site stated they were experiencing delays with being able to transfer this waste on, due to ongoing complications with insurance companies. The site expressed their frustration that this was currently taking up space within their quarantine area. These delays also have the potential to have a knock on impact of them being unable to adhere to the maximum storage times under their FPMP.

A copy of the sites FPMP was stored in the emergency box, situated by the front gates.

Please ensure the listed action in relation to storage of WEEE is completed in line with the deadline given.

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](mailto: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](mailto: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](mailto: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.