

## Compliance Assessment Report CAR\_NRW0042524

**Permit being assessed:** YP3994FY.

For: Entrec Ltd, held by Entrec Ltd

At: Wrexham Industrial Estate, Wrexham, LL13 9RD.

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

On 26/09/2023 between 13:55 and 14:30.

Parts of permit assessed: waste storage, management system, waste returns, emissions, waste acceptance

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

**Report sent to:** Gavin Butler, manager on 12/10/2023.

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

| Part of permitted activity assessed (criteria)                                                                 | Assessment result | Permit condition |
|----------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| C2 - General Management - Management system and operating procedures                                           | Action only (X)   |                  |
| F5 - Amenity - Deposits on road                                                                                | Assessed (A)      |                  |
| C4 - General Management - Storage, handling labelling and Segregation                                          | Action only (X)   |                  |
| F1 - Amenity - Odour                                                                                           | Assessed (A)      |                  |
| F2 - Amenity - Noise                                                                                           | Assessed (A)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter                                                             | Assessed (A)      |                  |
| F4 - Amenity - Pests/birds and scavengers                                                                      | Assessed (A)      |                  |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | Action only (X)   |                  |
| C4 - General Management - Storage, handling labelling and Segregation                                          | 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 |
|------------------------------------------|----------------------------|
| 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 |
|----------|------------------------------------------------------------------|-------------|
| C2       | Please provide an updated version on your EMS                    | 03/11/2023  |
| C4       | Please ensure the quarantine area is clear and fully accessible. | 16/10/2023  |

| Criteria | Action needed                                                  | Complete by |
|----------|----------------------------------------------------------------|-------------|
| G4       | Please ensure waste returns are completed correctly.           | 12/10/2023  |
| C4       | Please replenish the spillage granules in the depollution area | 16/10/2023  |

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

On the 26<sup>th</sup> of September 2023 waste regulation officers visited the site.

It was an announced, routine inspection. Officers were met and accompanied by Darren Butler, Technically Competent Manager (TCM).

The site was last visited by Natural Resources Wales (NRW) on 8<sup>th</sup> of December 2022

At the time of inspection, the weather was dry and windy.

The site was very busy with customers queuing outside the office and employees working in the main yard.

There were no amenity issues (dust, odour, noise, litter or pests) noted during the inspection.

Officers checked the road leading onto the site and the perimeter fence and found them to be litter free.

Mr Butler took officers to the depollution area which appeared well-maintained with one vehicle awaiting depollution.

Officers asked to see the spillage kits and granules. Spillage kit was stored in this area, but the granules were not available.

**Action:** Please replenish spillage granules/kits. For immediate compliance.

Please supply photographic evidence of the granules in situ by Monday the 16th of October 2023.

#### **Quarantine area**

Officers checked the quarantine area which was being used for storage of cables. This has been discussed with the site TCM.

**Action:** Please remove all waste from the quarantine area and ensure it is always clear and readily accessible. Please supply photographic evidence by Monday the 16th of October 2023

#### **Waste returns:**

A review of Q3 and Q4 2022 and Q1 and Q2 2023 waste return submissions for permit number

EPR-YP3994FY has been completed.

Q2 and Q 3 2022 waste return show waste fuels being accepted on site (0.13T and 0.19T respectively). This has been discussed with the site manager who clarified that this waste stream had not been accepted separately but was recovered from accepted ELVs.

**Action:** Please ensure all waste returns are completed correctly. For immediate compliance.

#### **Environment Management System and Fire Prevention and Mitigation Plan (EMS and FPMP)**

An updated version of the EMS has been received by NRW and comments have been sent to the admin department.

EMS was also discussed with the site TCM. It transpires that the updated version does not reflect all activities taking place on site and storage areas that are currently being used.

Please ensure the final version is a true reflection of the current activities, procedures, and storage facilities.

Once the EMS is assessed and agreed by NRW please ensure all staff receive a fresher training.

**Action:** Please provide updated EMS by 3<sup>rd</sup> of November 2023

#### **WEEE acceptance**

Site waste returns do not list any WEEE being accepted on site. Could you confirm no WEEE items have been accepted on site in the past twelve months. Please reply by Monday the 16th of October 2023.

Should the site accept WEEE, now or in the future, there should be a dedicated WEEE storage area (please include on site map).

#### **FPMP**

Currently, the site doesn't benefit from a Fire Prevention and Mitigation Plan. All Waste Operators are advised to read NRW's Fire Prevention and Mitigation Plan guidance. It offers useful information regarding waste stockpile maximum sizes and distances to act as fire breaks and other fire prevention guidance. It also contains information about mitigation techniques, such as the use of a quarantine area on site and knowing the drainage layout in order to prevent the escape of fire water off site.

Separate guidance has been sent to the admin department.

Thank you for your time during the site inspection. If you have any questions regarding this compliance assessment form, please do not hesitate to contact me on the contact details below.

Kind Regards,

Boguslawa Pierzchala

**Boguslawa.Pierzchala@naturalresourceswales.gov.uk**

**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.