

Compliance Assessment Report CAR_NRW0043108

Permit being assessed: CB3896ZW.

For: Unit 15 Drome Road, held by Telecycle Europe Limited

At: Deeside Industrial Park, Sealand Garden City, Deeside, Flintshire, CH5 2NY.

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

On 14/12/2023 between 11:00 and 11:55.

Parts of permit assessed: 1.1 4.1

NRW Lead Officer: Ian Thomas2, accompanied by Boguslawa Pierzchala.

Report sent to: Jeremy Pudge, TCM on 18/01/2024.

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	C4 No impact	Permit condition 1.1.1 a, EMS condition 13

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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	Use of site diary to be implemented immediately. Copies of Permit, EMS and FPMP to be held in site office	31/01/2024

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 following a new permit being issued. I was accompanied on the visit by waste officer Boguslawa Pierzchala.

Upon our arrival we were met by Dean Graham – Site Manager and Ryan Eaton – Warehouse Manager, who are based at the facility. The site is situated on a small industrial area and is one unit, consisting of one main warehouse space and office space above.

At the present time the only process being carried out is the manual dismantling of circuit boards and small electronic units for the purpose of recovery. Although the permit allows the processing of catalytic converters, and the machine is located inside the warehouse, no catalytic converters are being accepted. The machine is not operational.



Bulk bags showing circuit boards and electronic devices for recovery.

The TCM for the permit is Jeremy Pudge, it is unclear how often Mr Pudge is attending site. At the time of the visit, he was preparing or taking his TCM qualification and was therefore not available. Telecycle Ltd are using a firm of consultants, Wiser Environmental Ltd, based in St Ives.

Both Mr Graham and Mr Eaton showed us around the facility and explained the process of recovery. As already mentioned, the main work being carried out is recovery from electronic circuit boards and similar small devices. Mr Graham stated that the Catalytic Converters machine is not operational and is not planned to be installed and used in the

near future. It was mentioned they may look at larger premises before incorporating the catalytic converter process. The staffing of the warehouse is usually via an agency, an induction is completed and recorded on an induction form.

All work is carried out inside the warehouse, one forklift truck is used. Security for the warehouse and site is covered by intruder alarms and live video connection.

We were shown to the office space where all relevant paperwork should be stored and available. When we requested documents to view it became apparent that the following documents were not in the office.

Site Diary

Environmental Management System

Fire Prevention and Mitigation Plan

Site Environmental Permit ref CB3896ZW

Inspection of Waste Transfer Notes(WTN), showed that some notes were missing the required European Waste Codes(EWC) required to be recorded on the relevant paperwork.

I explained to Mr Graham and Mr Dean that these documents are required to be kept as a copy on site at all times and be available as guidance for anyone that may need to refer to these records. This will be recorded as a **C4** score against the relevant permit condition, detailed in 'Compliance Criteria' above and in the Actions below.

Also noted was that the building security checks were not recorded but carried out visually by warehouse manager Ryan Eaton.

Actions.

Permit reference 4.1.2. The operator shall keep on site records, plans and the management system required to be maintained by this permit.

This is also referenced in the Site EMS

Permit reference 1.1.1

The operator shall manage and operate the activities: a) in accordance with a written management system....

EMS condition 13: As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the permit;
- Other legally required documents;

Please confirm these essential documents are made available and kept at the premises as soon as is practicable.



Items for onward distribution.

Thank you for assisting us with the inspection. Kind regards, Ian Thomas, Waste regulation Officer Please find your new regulating officer's contact details below. Email:

ian.thomas2@cyfoethnaturiolcymru.gov.uk

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.