

Compliance Assessment Report CAR_NRW0045581

Permit being assessed: ZP3695VH.

For: Refail Newydd, **held by:** Humphreys Waste Recycling Ltd

At: Caergeiliog, Holyhead, Gwynedd, LL65 3DX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/10/2024 between 10:45 and 11:30.

Parts of permit assessed: See below.

NRW Lead Officer: Sarah Walton, accompanied by Daniel Grant.

Report sent to: Cai Humphreys, Technically Competent Manager, on 07/11/2024.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|-----------------------------------------------------------|-------------------|------------------|
| W1A - Waste - Management - General management | Action only (X) | |
| W4A - Waste - Information - Records | Action only (X) | |

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

| Total 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 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| W1A | Review and update the site's Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP). Submit these documents to NRW for review. | 17/01/2025 |
| W4A | Please confirm what LoW (List of Waste) code is assigned to waste fines and provide Waste Transfer Notes for the most recent loads of fines removed from site. | 22/11/2024 |

Compliance 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

A routine site inspection took place on Thursday 24th October 2024. Sarah Walton (Waste Regulation Officer) and Daniel Grant (Hazardous Waste Regulation Officer) met on site with Cai Humphreys (Operations Manager / Technically Competent Manager).

The inspection began with a walk around the yard and waste treatment building. The new shed was still being constructed and the ground re-surfaced. It was mentioned, that on a previous CAR form, there was an action to review the site EMS and FPMP, but no response had been received. It was agreed additional time would be given to review the site's procedural documents, to ensure they capture the changes to infrastructure on site.

ACTION: Review the site's Environmental Management System (EMS) and Fire Prevention & Mitigation Plan (FPMP) and submit these documents to NRW review. Please ensure this action is completed by Friday 17th January 2025.

The main waste storage and treatment building was then inspected. The storage areas remained similar to the previous inspection. Officers observed some waste being stored in the bays below the treatment machinery.



is



Photographs showing waste storage on site

The stockpile that can be seen in the first photograph above was described as block and brick oversized. Cai explained this waste is segregated by hand from incoming skips. The other stockpile was awaiting further treatment.



Photograph showing waste storage on site

It was queried what happens to the waste fines from site. They are currently being stockpiled in a bay within the new shed area. Cai was not clear about where this waste was destined for but did confirm it would be sent to landfill.

ACTION: Please confirm what LoW (List of Waste) code is assigned to the fines (as shown in the photo above) and provide Waste Transfer Notes for the most recent loads of fines removed from site.

Officers went to the site office to view a selection of waste transfer notes. No issues were found with these documents.

The inspection was completed at around 11:30.

Should you wish to discuss or query anything in this CAR form, please get in touch using the details below.

Kind Regards,

Sarah Walton

Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer

Gogledd-Orllewin / North West

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.