

Compliance Assessment Report CAR_NRW0045590

Permit being assessed: ZP3594FN.

For: W H Chaloner & Son Ltd, held by W H Chaloner & Son Limited

At: Llay Industrial Estate, Wrexham, Clwyd, LL12 0PJ.

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

On 06/11/2024 between 09:45 and 10:50.

Parts of permit assessed: 1.1.1 2.4.2

NRW Lead Officer: Ian Thomas2.

Report sent to: Stephen Chaloner, TCM and owner on 25/11/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W2F - Waste - Operations - Technical requirements	Action only (X)	
W2D - Waste - Operations - The site	Action only (X)	
W2A - Waste - Operations - Permitted activities	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
W1A	Ensure a copy of permit ZP3594FN and the EMS for the site is available for staff.	31/12/2024
W2F	Forward certificate when completed WAMITAB exam	20/12/2024
W2D	Cables and engine removed from skip storage area according to site plan	31/12/2024
W2A	Removal of excessive amount of WEEE stored and have separation for storage	31/12/2024

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

On Wednesday the 6th November 2024 Natural Resources Wales carried out a routine unannounced site inspection. The visit was carried out by Waste Regulation Officer Ian Thomas.

On arrival I. Thomas met with Steven Chaloner, one of the site owners. Steven explained that the office staff were not on site and some documents were stored digitally. Prior to my visit, waste returns were checked and were found to be up to date. Steven accompanied me around the site and throughout the inspection.

The weather was dry and overcast. The site is organised with areas dedicated to the various waste streams. The bay for all waste electronic and electrical equipment(WEEE) looked to be full and was partly merging into other waste piles close by. Steven explained they were reliant on the WEEE being collected and that the contractor was due.

Action: Please ensure there is separation of the WEEE waste storage to make sure it does not enter into the wrong waste stream.



WEEE storage area.



Waste WEEE storage above bay area.

The WEEE storage is substantial at present, some housekeeping and management is required. The site plan shows the WEEE storage area to be in the top right hand corner of the site, but looks to have expanded into the storage area for Borings and Turnings.

Please confirm the quantity of waste tyres 16 01 03 on site. The storage area is quite full with some stored within skips.



Tyre storage.

All gas cylinders are securely stored in a lockable area inside the site.

Again, relating to housekeeping and clear storage areas, there is a large amount of cabling gathered in front of the area designated to skip storage. Also, an engine stored in the same area, has the engine been depolluted? Engines and associated parts must be stored under cover.



Cable storage



Cable and engine.

The indoor area is now for storage of non-ferrous metals and batteries. All batteries are stored in

containers and are under cover ready for collection. No depollution takes place on site although the depolluting rig is still located inside the building.

We returned to the site office, Stephen was unable to locate a copy of the permit for the site, or the EMS.

Action: Please make sure a copy of the required documents are available for all staff.

Stephen explained he was booked on to the WAMITAB exam in the next few weeks.

Action: Please send a copy of the certificate to show continuing qualification as the technically competent manager.

Thank you for your time during the inspection, please find my contact details below. Kind regards
Ian Thomas Waste regulation Officer (Waste Regulation Team)

Email: ian.thomas2@naturalresourceswales.gov.uk

Post: 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.