

Compliance Assessment Report CAR_NRW0045675

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 15/11/2024 between 12:30 and 13:30.

Parts of permit assessed: 1.1.1.

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

Report sent to: Darren , Manager on 29/11/2024.

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	C3 Minor	Condition A Part 3 (1) of The Environmental Protection Miscellaneous Amendments) (England and Wales) Regulations 2018
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W3D - Waste - Emissions and monitoring - Noise and vibration	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
1	4

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	Please ensure your storage arrangements are as detailed in your per Site Plan (EMS) and changes do not increase fire and pollution risk.	02/12/2024
W1A	Please ensure the acceptance, storage, handling and treatment of WEEE is compliant with the site permit and EMS	29/11/2024

Criteria	Action needed	Complete by
W4B	Please provide duty of Care documents for the removal of fire water	06/12/2024
W1A	Please provide a copy of the Fire Prevention and Mitigation Plan	06/12/2024

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 the 15th November 2024 waste regulation officers visited the site.

It was an announced inspection and a follow-up check after a fire incident that occurred on site on the 4th of November 2024.

Waste regulation officers were met by Darren Butler, Technically Competent Manager (TCM) who accompanied them throughout the inspection.

Mr Butler asked officers to sign in on their arrival.

The weather was dry and windy. It had been raining prior to the inspection. Officers noticed rain water pooling on the main yard.

The site was operational and busy with customers bringing in waste.

Depollution area

Mr Butler took officers to the depollution area which appeared well-maintained with one vehicle awaiting depollution. Officers noted that there were sufficient spillage kits and granules in case of a spill.

Quarantine area

Officers checked the area used for storage of cables. Please see photos below.

The storage of waste was not compliant with the site Plan detailed in the Environment Management System – EMS.

This area and the storage arrangements had also been discussed with the site TCM during previous site inspection.

A number of piles were seen with no clear fire breaks which increases the risk of fire and potential pollution. Approximately 3 m high piles of cable were stored in the area where the site plan

indicates the location of a quarantine skip.

This is a breach of Condition A Part 3 (1) of The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018.

This breach has been assigned a **C3 score**.

The breach is not an offence; however, we have the power to serve an enforcement notice for this breach. Failure to comply with the notice is an offence.



Cables stored close to the tyre storage area in place of the quarantine skip





Storage of cables on site

Action: Please ensure waste storage is compliant with the site plan detailed in EMS.

Also, please remove all waste from the quarantine area and ensure it is always clear and readily accessible. For immediate compliance

WEEE acceptance, handling, dismantling and storage procedure

Officers saw WEEE items on the main yard with other waste metal. Please see photos below.

Officers asked to see the separate storage area for this particular waste stream. Mr Butler took the officers to the part of the building where WEEE is kept. Unfortunately the main door was locked. Officers saw the metal containers used for the storage of WEEE through a gap but did not physically check the area.



WEEE in the main yard

Action: Please ensure you follow procedures detailed in Table 4.4 g) of the site permit and sections 3.8, 3.15 of the EMS. For ongoing compliance.

FPMP- Fire Prevention and Mitigation Plan

On the 4th of November a fire incident occurred on site. The fire started in the part of the building that is not used or managed by Entrec Ltd; however, the managers had been actively involved in

dealing with the incident.

Officers asked for the duty of care documents for the removal of fire water, these were not readily available.

Action: Please provide duty of care documents for the removal of fire water. Please comply by the 6th of December 2024.

Mr Butler stated that the site has a Fire Prevention and Mitigation Plan.

Action: Please provide a copy of your current the FPMP by the 6th of December 2024.

No issues were observed regarding litter, noise or vibration.

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 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.