

Compliance Assessment Report CAR_NRW0048204

Permit being assessed: BB3436RA.

For: Phase 2 Wrexham Recycling Park, **held by:** FCC Recycling (UK) Limited

At: Wrexham Recycling Park, Wrexham Industrial Estate, Wrexham, Clwyd, LL13 9UT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 30/04/2025 between 09:48 and 13:30.

Parts of permit assessed: See Report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Carter Shone.

Report sent to: Operations Manager, Operations Manager, on 08/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR3I - Installations - Emissions and monitoring - Fire	Assessed (A)	

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?

No action required.

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 Compliance Assessment Report (CAR) has been raised following a pre-arranged site inspection and Operator Monitoring Assessment (OMA).

OMA Air Audit

All air emissions monitoring is carried out by suitably qualified MCERTS accredited external contractor. The sites management system of air emissions monitoring is of a high standard.

The site achieved an overall score of 97% for the OMA audit for air. The following recommendations have been made in order to improve the overall score:

- 1) All emission monitoring data is periodically reviewed to analyse for any trends.
- 2) Include the impact from Volatile Organic Compounds within the site aspects and impacts register.

Please refer to the full OMA audit report for more details.

The site does not discharge any waste water from emission point S1 as waste water from the bio-drying tunnels is tankered off site. A copy of the waste transfer note was provided for the most recent collection.

Site Visit

The site visit was timed to correspond to when the monitoring contractors were on site so we were able to view them setting up the equipment and undertaking the monitoring for odour, ammonia, particulates and Total Volatile Organic Compounds (TVOC's). No issues were noted although for the odour monitoring the contractor did state that higher temperatures would have to be noted during storage and transportation of the samples, which has the potential to affect the results as it was a particularly hot, sunny day.

Whilst we were on the roof of the permitted facility viewing emission point A1 and the associated monitoring were also able to see the improvements the site had made to their suppression system for the bio-drying tunnels. New hoses connected to the hydrant were installed on the roof as well as 3 extra thermocouple points on each tunnel. These points can also be used in the event of fire with spray connections that connect to the new hoses.

This will aid in the suppression of fire as prior to this the only access for fire suppression was from the main door into each bio-drying tunnel. The extra thermocouples installed on each bio-drying tunnel have been linked back to the main SCADA system for the MBT plant which we were able to see in operation. The current Fire Protection and Mitigation Plan (FPMP) for the site is being updated with these improvements.

We also, via the SCADA system, viewed the management of the two biofilters that clean the air from the MBT area before being discharged to the stack (Emission point A1). The biofilters are monitored for temperature on the SCADA system but weekly samples are also taken which are analysed for moisture content. This is one of the checks to ensure the filters are functioning correctly.

The biofilter for the IVC permit was also viewed which is monitored on a separate SCADA system. All the new equipment in the IVC has been installed and commissioned since the last site visit.

Both permitted sites were clean and tidy, in full operation and no issues were found during the inspection.

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

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.