

Compliance Assessment Report CAR_NRW0046497

Permit being assessed: WP3694FZ.

For: Safetykleen Broughton, **held by:** Safety Kleen U K Ltd

At: Broughton, Deeside, Flintshire, CH4 0BY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 27/02/2025 between 13:35 and 14:00.

Parts of permit assessed: Labelling and segregation, storage, record keeping.

NRW Lead Officer: Joe Weatherley.

Report sent to: Brett Williams, Site Manager, on 11/04/2025.

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	Assessed (A)	
W1C - Waste - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2B - Waste - Operations - Waste recovery plan	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W4A - Waste - Information - Records	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

On Thursday 25th February 2025, Waste Regulation Officer Joe Weatherley, carried out a routine unannounced inspection at Safetykleen, Broughton. On arrival at the site the officer was greeted by an operative and was invited to sign the attendance register in the site office. This operative then accompanied the officer on the inspection tour of the site. Materials with a flash point below 34°C, were stored in separate containers as per the site working plan. Incoming and outgoing materials were stored in sealed and marked containers that clearly identify the substances contained. The officer asked to see the attendance register in order to verify adequate Technically Competent Manager (TCM) attendance. The site manager explained that since a previous manager had left, a TCM had not been resident at or visited the site and went on to show the officer a Competence Management System Approval Certificate. This document is valid until 4th September 2027, certifies that staff at the site are adequately trained in environmental management and negates the requirement for TCM attendance. NRW currently have on file, a full copy of the certificate that ran out on 12th June 2024.

Action: Please send to NRW a full copy of the current certificate.

Unbunded diesel storage IBC



Guidance on the Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016 :

These regulations apply to storage of diesel and state the following:

*" A secondary containment system (e.g. bund or drip tray) **must** be provided to catch any oil leaking from the container or its related pipework and equipment. The secondary containment system for a tank, IBC or mobile bowser **must** be sufficient capacity to contain at least 110% of the maximum contents of the oil container. Where more than one container is stored the bund must be capable of storing at least 110% of the largest tank (or of one tank if they are the same size), or at least 25% of the total storage capacity, whichever is the greater. "*

Action: Please provide a bund for the diesel IBC, that fulfills the requirements of the regulations above. Alternatively, store the IBC within a suitable bunded container.

A previous site inspection visit was carried out in 2022. Part of the scope of this visit was to assess a proposed change of storage process for oily absorbent rags. The proposed changes have been trialed and the process has resumed to the original format for storage.

Overall, the site is very clean and well organised.

Thank you for your time during the visit. If you have any queries or would like to discuss the report please don't hesitate to contact me using the below email

Kind Regards

Joe Weatherley

Waste Regulation Officer (NE Waste Regulation Team)

Email: joe.weatherley@cyfoethnaturiolcymru.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

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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.