

Compliance Assessment Report CAR_NRW0048146

Permit being assessed: UP3794FZ.

For: Worldcare Wales Ltd, **held by:** World Care (wales) Ltd

At: Worldcare Wales Ltd, Llandudno Junction, Conwy, LL31 9PN.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/03/2025 between 10:00 and 12:00.

Parts of permit assessed: See below.

NRW Lead Officer: Sarah Walton, accompanied by Cheryl Griffiths.

Report sent to: Lee Jones, Director, on 02/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2F - Waste - Operations - Technical requirements	C3 Minor	1.4.1
W2D - Waste - Operations - The site	C2 Significant	1.1.4
W2A - Waste - Operations - Permitted activities	C3 Minor	4.6.1.
W2E - Waste - Operations - Waste acceptance	C3 Minor	1.1.4
W2D - Waste - Operations - The site	C3 Minor	1.1.2
W1A - Waste - Management - General management	C2 Significant	1.1.6
W2F - Waste - Operations - Technical requirements	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
6	78

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
W2F	Whilst the site is open to receive or dispatch waste, ensure there is always at least one member of staff who is suitably trained and fully conversant with the requirements of the licence.	02/05/2025
W2D	Improve site infrastructure to ensure waste is stored only on impermeable surfaces with sealed drainage. Provide evidence to NRW that surfaces are impermeable and site drainage is sealed.	25/07/2025
W2A	Ensure solid waste capable of generating significant quantities of dust, fines or particulates, are stored within a building/container on impermeable ground with sealed drainage. Hazardous waste must be stored in sealed containers within a hazardous waste store	30/05/2025
W2E	Repair or replace broken skips. Ensure waste is contained to skips and bays only. Reduce volume of waste on site, so that waste is stored within skips and bays only. Ensure wastes are clearly segregated and stored in line with the site EMS.	23/05/2025
W2D	Perform a litter pick beyond the site boundary and ensure lighter wastes are secured to prevent wind from carrying it off site. Remove all waste being stored outside the permit boundary. This should be moved onto the site if a permitted waste type, or removed to another authorised waste facility.	12/05/2025
W1A	Ensure EMS procedures are implemented and followed at all times. Review and improve the site's EMS procedures, with a focus on staff competence, drainage infrastructure, non-hazardous and hazardous waste storage & containment of waste within permit boundary. Submit this document to Natural Resources Wales for review.	30/05/2025
W2F	Provide evidence of both primary competence qualification as well as the most recent continuing competency certificate	16/05/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

A routine site inspection took place on 26/03/2025 by Waste Regulation Officers, Sarah Walton & Cheryl Griffiths.

When officers entered site, Lee Jones (Director & TCM), was not present. There did not appear to be anyone available with technical knowledge of the permit. Therefore, officers walked around site unaccompanied.

Permit Condition 1.4.1 "Whenever the site is open to receive or dispatch wastes, or is carrying out any of the specified waste management operations, it shall be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the licence regarding:

a)waste acceptance and control procedures

b)operational controls

c)maintenance

d)record-keeping

e)emergency action plans

f)notifications to the agency

As there was no-one available on site with knowledge of the permit, this is a breach of condition 1.4.1 and as such a CCS C3 score has been applied.

The site was open for waste acceptance at the time of the inspection. If there is no one with knowledge of the permit to oversee operations, this means any permit breaches or incidents may not be identified and actioned accordingly.

ACTION: Whilst the site is open to receive or dispatch waste, ensure there is always at least one member of staff who is suitably trained and fully conversant with the requirements of the licence.

Officers entered site from the rear of the yard, following an inspection at the adjacent Worldcare Recycling Limited site.

The ground was visibly unmade in parts. This was particularly obvious at the rear, near to where the waste wood and green waste is stored and by the trommel at the entrance. See examples shown in photos below.

Permit Condition 1.1.4 "No waste management operations shall be authorised by this licence unless: a) Specified in and undertaken in accordance with the limitations in the following table. Table 1.1 states "All non-hazardous waste must be treated on an impermeable surface with sealed drainage".

Permit condition 2.1.2 "The engineered site containment and drainage systems shall be designed, constructed, inspected, validated and maintained, and shall be fully documented and recorded, to be fit for purpose, and, where provided, to meet the standards specified in Table 2.1 below".





Photographs showing ground conditions on site

As well as unmade ground, there is no visible drainage on site. On previous CAR forms (from inspections 09/11/2023, 18/03/2024, 03/06/2024), actions have been placed on the operator to provide evidence that 'site containment and drainage systems are designed, constructed, inspected, validated and maintained, and are fully documented and recorded, to be fit for purpose, and, where provided, to meet the standards specified in Table 2.1'.

The operator has not responded to any of these actions.
It was clear walking around site, that waste was being stored on unmade ground.
Therefore, the operator is deemed to be breaching permit condition 2.1.2 and 1.1.4. As the site holds an older style permit and both permit conditions relate to the non-compliance, one CCS C2 score has been assigned against permit condition 1.1.4.

Storing waste on un-made ground without sealed drainage, means oils & harmful run off from waste may impact surface or groundwater.

If there is rain, there does not appear to be any system to capture run off from the waste.

ACTION: Improve site infrastructure to ensure all areas of the site used to store waste, are impermeable with sealed drainage. Please submit evidence to NRW that shows all surfaces used to store waste are impermeable with sealed drainage.

NRW is now considering enforcement options to deal with this permit breach.

Permit Condition 4.6.1 "Notwithstanding the specification of permitted waste types under condition 1.2, wastes displaying any of the hazardous properties or forms specified in Table 4.6 shall only be stored on site in accordance with the standards specified in Table 4.6 below"





Photographs showing stockpiles of fines waste

In the corner of the site, fines waste was being stored. Adjacent to these stockpiles was a trommel machine. A phone call and follow up email with the operator following the inspection, established that fines were being treated to remove as much of the recyclable material as possible. Visually looking at the two stockpiles, they appeared very similar in nature. Within the waste, and in particular at the bottom of the stockpiles, was a significant amount of polystyrene, plastics and other contaminants.

In an email to the operator following the inspection, waste transfer notes were requested for all 19-12-12/19-12-11* waste that has been removed from site. The operator responded to say that no waste has ever been removed from site under these waste codes. This is concerning, given that the site is mechanically treating waste using a trommel. Trommel fines would typically be classified as 19-12-11* (other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances) or 19-12-12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11).

Table 4.6 section (a) states *"Solid wastes which when handled or stored are likely to generate significant quantities of dusts, fibres or particulates"*. It goes on to state the standards for storage of this waste type; *"These wastes only permitted if they are handled and stored either in i) buildings or containers providing containment of aerial emissions of dusts and particulates; or ii) bays or roofed areas provided with a permanent water supply and water spraying or misting equipment, and with an impermeable pavement and a sealed drainage system; and the water spraying or misting equipment is used at all times when the significant quantities of dusts, fibres or particulates are likely to be generated"*.

As identified in the photographs above, the site is not compliant with permit condition 4.6.1 (Table 4.6). Waste fines are being stockpiled on unmade ground (as opposed to impermeable pavement with sealed drainage). Waste fines (which are capable of generating significant quantities of dust, fibres & particulates), were not being stored in a building or container. There was no evidence of any attempt being made to dampen down this waste.

Table 4.6 also specifies conditions for the storage of hazardous wastes.

Section i) states *"Hazardous waste shall only be stored in sealed containers within a hazardous waste store. Lead acid batteries shall be stored in a covered area with an impermeable acid resistant base or in an acid resistant leak proof container with a close fitting lid."*



**Photographs showing storage of batteries on site**

As can be seen above, lead acid batteries were observed being stacked on the ground adjacent to the waste wood skip. There was another battery being stored on ground near to the trommel at the rear of the site. As per section i) of Table 4.6, lead acid batteries must be stored in a sealed container within designated hazardous waste store.

The acid contained within these batteries is highly corrosive presenting a risk to both humans and the local environment. They can also emit gases which are highly flammable, posing a fire risk. This is particularly concerning as the batteries are not being contained and are being stored next to combustible wastes.



Photograph showing waste fridge/freezer on site

The photograph above shows a waste fridge/freezer, in a poor dismantled condition. The compressor and electrical wires were still visible within this waste.

Compressors can contain harmful refrigerants such as CFC's/HCFC's. Coolants and foams can also be hazardous components. Motors & circuit boards can contain POPs (Persistent organic pollutants).

This fridge had been badly damaged and was being stored on top of other residual waste. Hazardous waste must be kept separate from non-hazardous waste.

This hazardous waste should be stored within a sealed container, within a hazardous waste store.

The operator is not storing waste in compliance with permit condition 4.6.1, therefore a CCS C3 score has been applied for the above permit breaches.

ACTION: Ensure solid waste capable of generating significant quantities of dust, fines or particulates, are stored within a building/container on impermeable ground with sealed drainage.

ACTION: Hazardous waste must be stored in sealed containers within a hazardous waste store

Permit Condition 1.1.4 *"No waste management operations shall be authorised by this licence unless: a) Specified in and undertaken in accordance with the limitations in the following table. Table 1.1 states "Maximum storage capacity of the site shall not exceed that which can be contained within skips and bays, constructed in accordance with conditions in section 2.1".*





Photographs showing waste storage on site

Waste storage on site was exceeding capacities of skips and bays. The skips storing the waste wood are no longer fit for purpose. The sides have broken meaning they are no longer able to suitably contain the waste. Waste such as mattresses and wood were overflowing and were not contained to a skip or bay. Other wastes on site were exceeding skips and bays (examples shown above). Because of this, there is a lot of litter and waste scattered around the site, making it difficult to distinguish separate waste streams. The large stockpiles of combustible waste like wood, are posing a fire risk.

There needs to be clear and segregated storage areas for each waste type. The most recent version of the site's Environmental Management System (EMS), does not have a site plan showing designated storage areas. This needs to be formulated.

There was a significant amount of mattresses being stored on site. There are concerns the site is stockpiling this waste indefinitely and exceeding waste storage times.

The site has therefore been scored a CCS C3 for breach of permit condition 1.1.4.

ACTION: Repair or replace broken skips. Ensure waste is contained to skips and bays only. Reduce volume of waste on site, so that waste is stored within skips and bays only. Ensure wastes are clearly segregated and stored in line with the site EMS.

ACTION: Provide the most recent waste transfer notes that show removal of mattresses from site.

Permit condition 1.1.2 "No deposit of waste shall take place outside the area of land marked in red on drawing No. (one) of the working plan".

To the east side of the site, there is a significant amount of litter and waste leaving/deposited beyond the permit boundary.





Photograph showing waste beyond permit boundary

Beyond the permit boundary to the east, a large amount of litter was observed leaving site. Plastic pieces were caught in the fence and bushes surrounding the site. There was a pile of tyres and a few mattresses beyond the site boundary.

This presents environmental risk as litter can pollute the local environment. Storing waste outside the permitted area, on unmade ground means any harmful runoff cannot be captured.

As such, a CCS C3 score has been applied for this permit breach.

ACTION: Perform a litter pick beyond the site boundary and ensure lighter wastes are secured to prevent wind from carrying it off site.
Remove all waste being stored outside the permit boundary. This should be moved onto the site if a permitted waste type, or removed to another authorised waste facility.

Permit condition 1.1.6 *"The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints;"*

Following the site inspection, the operator submitted conveyance notes appearing to show 'soil disposal' at a quarry in North East Wales. There was no LoW code assigned to this soil and it was not clear exactly whether this material was being moved as a waste or a product.

ACTION: Please respond to this CAR form explaining exactly what the conveyance notes submitted to NRW on 7/4/2025 are showing. Please include details of the waste being moved, where it has been moved to and from and total volumes moved. Please also submit the accompanying waste transfer notes for this waste movement.

The site EMS has a site plan on page 93. This is not reflective of waste storage arrangements on site. The operator should either store waste in accordance with this plan, or revise the document.

The EMS is not meeting minimum standards for waste storage.

As per 'How to comply with your environmental permit' guidance document, the site EMS should include as a minimum:
must include:

- storage times and procedures to ensure that these times are not exceeded
- maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded
- maximum storage heights to prevent or minimise the emission of dust, litter and throughput management
- a procedure to identify the specific waste types stored at your facility
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures.

The root cause of all the non-compliances in this CAR form, is deemed to be a lack of adherence to EMS procedures and insufficient EMS procedures to manage environmental risks posed by the site.

The EMS should be the site's cornerstone for environmental protection. The above non-compliances suggest systematic failure of the operator to minimise risk of pollution. The operator must ensure the EMS procedures are sufficient to protect the environment from waste operations.

As such a CCS C2 score has been applied against permit condition 1.1.6.

ACTION: Ensure EMS procedures are implemented and followed at all times. Review and improve the site's EMS procedures, with a focus on staff competence, drainage infrastructure, non-hazardous and hazardous waste storage & containment of waste within permit boundary. Submit this document to Natural Resources Wales for review.

Technical competence

Due to the issues concerning the environmental management of site operations, please submit evidence of technical competency to NRW.
Submit evidence of both the primary competence qualification as well as the most recent continuing competency certificate.

ACTION: Provide evidence of both primary competence qualification as well as the most recent continuing competency certificate

Thank you to all staff who assisted officers with the inspection.

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.