

Compliance Assessment Report CAR_NRW0049344

Permit being assessed: YP3994FY.

For: Entrec Ltd, **held by:** Entrec Ltd

At: Wrexham Industrial Estate, Wrexham, LL13 9RD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/09/2025 between 11:00 and 12:35.

Parts of permit assessed: waste storage, acceptance procedures, rejected waste.

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Joe Weatherley.

Report sent to: Gavin Butler, Manager, on 30/09/2025.

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	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	EMS section 3.8 and Table 1.1 Specified waste management operations • Maximum storage capacity as detailed in the working plan and agreed with the (v) All other wastes as Environment Agency. detailed in Appendix B of this licence • Wastes shall be stored in skips, containers this licence. or bays and on an Impermeable Pavement with a sealed drainage system provided in accordance with condition 2.1 Only

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		permitted if the working plan is amended in accordance with condition 1.12.
W1A - Waste - Management - General management	Action only (X)	

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

Total 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 the cable storage area is kept tidy with waste streams clearly separated as detailed in the site plan. There should be unobstructed access to the interceptor at all times	30/09/2025
W1A	Please revisit your waste acceptance procedures with relevant staff members. Please ensure that the pressurised gas containers cage is secure with a padlock. For immediate compliance	30/09/2025
W1A	Please store all WEEE as detailed in the above section of the site EMS. Please ensure all waste is stored as detailed in the site permit and EMS.	31/10/2025
W1A	Please ensure storage areas are compliant with Section 2.1.4 of the site permit	31/10/2025

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.

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 9th of September 2025 waste regulation officers visited the site.

The officers were met by Darren Butler, Technically Competent Manager (TCM) who asked them to sign in.

The weather was dry and windy. It had been raining prior to the inspection.

The site was operational with operatives sorting waste in the main yard and customers arriving on site.

Mr Butler phoned his brother, Gavin Butler, who attended site shortly after and accompanied officers throughout the inspection.

Gavin discussed future plans for the site with officers which include improved site infrastructure and new storage bays made with concrete blocks.

This arrangement would improve fire safety as well as providing more defined storage spaces.

Depollution area

Mr Butler took officers to the depollution area which appeared well-maintained with one vehicle awaiting depollution. There were no readily available spillage kits or granules in this area which was brought to Mr Butler's attention. The granules were replenish before officers left the site.

(W1A) General management

Cable storage area.

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

It was noted that the cables were stored in large piles very close to the interceptor, with some of them left on top.

Several storage bags were seen with large holes and rips, and their contents spilled on the ground.

Action: Please ensure this area is kept tidy with waste streams clearly separated as detailed in the site plan. There should be unobstructed access to the interceptor at all times. For immediate compliance.



Cables stored on site



Damaged storage bags



A fire extinguisher in a pile of cables.

(W1A) General management

Non-confirming waste

Officers noted a fire extinguisher between waste cables.

This was brought to Mr Butler's attention. Officers recommended looking into the acceptance procedures to ensure non-confirming wastes are being dealt with effectively.

Fire extinguishers are not listed as permitted waste on the site permit and should have been separated from the cables and placed in a lockable storage cage.

The officers then asked to see the cage which was available on site but had no padlock on .

Mr Butler was asked to place the fire extinguisher inside and ensure a padlock is available to lock the cage.

This part of the site looked untidy with various metal waste strewn on the ground. There was waste stored in an open top containers next to the cage. Officers noted WEEE amongst this waste.

Section 2.9.2 of the site EMS states:

Other hazardous storage - The site will not routinely accept or store gas cylinders but there is a caged area to store them if any are discovered in loads. The site will not routinely store aerosols or other combustible liquids but any discovered will be quarantined.

Action: Please revisit your waste acceptance procedures with relevant staff members. Please ensure that the pressurised gas containers cage is secure with a padlock. For immediate compliance.



Pressurised gas containers storage cage with no padlock and various waste on the ground.

(W1A) General management

Waste storage was discussed with Mr Butler.

Some of the waste storage arrangements were not compliant with the site permit and/or Environmental Management System- EMS as listed below.



Wooden pallets and other waste stored in the “sorted scrap metal storage bay” as detailed in the EMS/ site plan



Waste strewn on the ground by the pressurised gas cylinders cage



Open top skip with various wastes including circuit boards

EMS section 3.8**WEEE handling and dismantling procedure**

c) WEEE, disassembled spare parts, components or residues must be stored on an impermeable surface with sealed drainage with provision of spillage collection facilities and, where appropriate, decanters and cleanser degreaser

d) WEEE, disassembled spare parts, components or residues must be stored in areas provided with a weatherproof covering where appropriate or in containers providing a weatherproof covering where appropriate

This breach has been assigned a CCS 3 score against the relevant permit conditions.

Action: Please store all WEEE as detailed in the above section of the site EMS. For immediate compliance



Water logged storage area



Water logged storage area



Waste stored on waterlogged ground

Section 2.1.4 of the site permit states:

- ii areas of impermeable pavement are free from cracks which could increase permeability; and
- iii areas of impermeable pavement are resistant to mechanical, physical and chemical stresses to which they may be subjected;
- and iv areas of impermeable pavement fall towards the drainage system to prevent ponding; and v no liquid will run off areas of impermeable pavement other than via the drainage system; (...)

Action: Please ensure all storage areas are even, maintained as detailed in the site permit and EMS, free from standing water. Please comply by **the 31st of October 2025**.

Officers checked the Storage area for "depolluted ELVs and ferrous metal prior baling" marked on the site plan as **impermeable concrete surfaces**. It transpires that the waste is being stored on permeable ground and on a soil bund. Please see photos below



Waste stored on permeable ground against a soil bund



Waste stored on permeable ground with some waste strewn on the soil bund

The storage of waste was not compliant with the relevant sections in the Environment Management System – EMS.

This is a breach of the below permit condition and has been given a **C3** score which has been **consolidated** with the similar breach in this compliance criteria.

Table 1.1 Specified waste management operations

- Maximum storage capacity as detailed in the working plan and agreed with the (v) All other wastes as Environment Agency. detailed in Appendix B of this licence
- Wastes shall be stored in skips, containers this licence. or bays and on an **Impermeable** Pavement with a sealed drainage system provided in accordance with condition 2.1 Only permitted if the working plan is amended in accordance with condition 1.12.

Action: Please ensure all waste is stored as detailed in the site permit and EMS. Please comply by the **31st of October 2025**.

Tyres storage was discussed with Mr Butler who re arranged the location of the tyres.

Please update your site plan to reflect that change and ensure the storage is compliant with Table 4 4 Standards for waste acceptance and control procedures d) Waste control procedures: storage of whole tyres.

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,

Boguslaw Pierzchala

Boguslaw.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.

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.