

Compliance Assessment Report

Report ID:
CAR_NRW0036707

This form will report compliance with your permit as determined by an NRW officer

Site	Parry and Evans Ltd	Permit Ref	CB3593HF		
Operator/Permit holder	Parry And Evans Limited				
Regime	Waste Operations				
Date of assessment	26/06/2020	Time in	N/A	Out	N/A
Assessment type	Site Inspection				
Parts of the permit assessed	Management system & operating procedures; Accident, emergency and incident planning; Staff competency				
Lead officer's name	White, Steven				
Accompanied by					
Recipient's name/position	Dave Evans, Nick Owen/ Director/TCM	Date issued	26/06/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	----------	---	----------

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This was a review of the site incident procedures and Fire Prevention and Mitigation Plan (FPMP) following the fire at the Deeside Industrial Park site on 28/05/2020. Due to the current Covid-19 restrictions & NRW guidelines officers did not attend the incident but were on standby to do so should the incident have escalated further.

From accounts of the North Wales Fire & Rescue Service (NWFRS), NRW incident log and Parry & Evans incident review the following review was carried out into the incident and FPMP.

NWFRS received notification at 17:37 and were on site soon afterwards, an area in Zone 2 of the site (the previously exempt area) with ~500T of mixed paper, plastic and card was alight. On arrival NWFRS were handed the most recent FPMP (a copy of which is stored near the site entrance), on liaising with site operatives the interceptor was closed off, site drainage was reviewed and measure put in place quickly to reduce any environmental impact from the fire runoff. The site drains to a soakaway to the south of the site, hydrants were located and the NWFRS Environmental Protection Unit was deployed to assist with water supply.

The source of ignition is currently unknown, approx. 50T of waste on site was affected by the fire, once this had been doused down by NWFRS this was removed during the response to an area separate from the rest of the waste on site; this was then further doused. Fire breaks in the waste were put in place and extended when access was deemed safe to do so. The fire lasted for approx. 7 hours and site operatives carried on damping down the waste after NWFRS had left site.

Parry and Evans are carrying out their own FPMP review following the incident. Preventative measures for fires on the site will need reviewing as something occurred on site that caused a fire to break out, at present the cause of the fire is unknown. It is recommended that the site reviews the FPMP looking at waste storage conditions, detection measures, monitoring of stack temperatures and CCTV to ensure that the risk of another fire is reduced.

An NRW review has recorded the following:

- The site FPMP was easily accessible to NWFRS and was quickly delivered to them
- All the relevant information including drainage maps, site access points, hydrants and waste types/volumes and locations on site were available within the FPMP
- Site operatives were knowledgeable about the FPMP, site operations, drainage and interceptors and were very helpful throughout the incident
- Fire prevention measures are to be reviewed.
- The FPMP has recently been updated to include Zone 2 during the permit variation in December 2019; all relevant parts of the site are included in the updated FPMP
- NWFRS have indicated that the Parry and Evans FPMP was a valuable asset in their response to the fire and were impressed and appreciative of site operatives knowledge and assistance during the incident.

The conclusions to the Parry & Evans FPMP review are that it is suitable for the site, easily accessible and available for NWFRS, it contains the relevant & required necessary information for use by both NWFRS and Parry & Evans staff during an incident. Parry & Evans staff were knowledgeable about the contents and location of the FPMP and were able to assist the NWFRS well on the day; this was acknowledged by NWFRS.

Thank you for your assistance during the incident, please find my contact details below.

Regards

Steven White

Senior Environment Officer (Waste Regulation Team)

Email: steven.white@naturalresourceswales.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.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036707**

This form will report compliance with your permit as determined by an NRW officer

Site	Parry and Evans Ltd	Permit Ref	CB3593HF
Operator/Permit holder	Parry And Evans Limited	Date	26/06/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.
Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.