

Compliance Assessment Report CAR_NRW0037083

Permit being assessed: EP3694FR.

For: P Dobbins Chester Ltd, held by P Dobbins Chester Limited

At: Old Railway Buildings, Saltney Ferry Road, Saltney, Flintshire, CH4 0BP.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 13/10/2020 between 12:20 and 12:50.

Parts of permit assessed: management system and operating procedures; storage, handling, labelling and segregation; site security; reporting and notification

NRW Lead Officer: Steven White, accompanied by Boguslawa Pierzchala.

Report sent to: Aaron Smith, manager on 03/11/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	

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

Total number of 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?

Criteria	Action needed	Complete by
G4	<p>Condition 4.2.2 of your permit requires you to submit within one month of the end of each quarter, a summary of waste quantities and types accepted on to and removed from site for that quarter.</p> <p>Waste returns were checked for the site - there are no waste returns on our database for Dobbins Ltd since June 2019.</p> <p>Action Required: The missing quarterly returns for Q3-4 2019 and Q1-3 2020 must be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk no later than 20th of November 2020</p>	30/11/2020

Criteria	Action needed	Complete by
C4	Weatherproof covering required for oil/fuel tank and battery boxes	30/11/2020

Action 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 Tuesday the 13th of October 2020 waste regulation officers Steve White and Boguslawa Pierzchala attended the site. Police officer Eryl Lloyd was also present during the inspection.

This was an announced inspection due to the current Covid 19 restrictions to ensure safety of all people involved.

The site was open with operatives on site performing their duties, site manager Aaron Smith was available to assist officers during the inspection.

A large area to the back of the site perimeter has been cleared which allowed officers to inspect it fully. The front of the site has also been cleared with a large amount of old metal stock already removed from the site.

The site is being run well with the new management adhering to the permit conditions.

A small number of End of Life Vehicles (ELV) was observed on site.

It rained heavily during the inspection and a mild sheen of oil was seen in the standing water near the ELVs storage area.



ELVs observed on site

A medium size oil tank was observed in the building situated behind the office. This building had previously been classed as a safety hazard; therefore, the officers did not enter. The building has no roof and the tank is not covered; the ingress of rain into the bund around the tank would mean that the 110% capacity required by the Oil Regs would be compromised. This was discussed with Aaron Smith during the visit will be addressed at the earliest opportunity as it poses a risk of oil spillage should the site be exposed to heavy rain.



Oil tank in the building

There were also some batteries stored inside a suitable box within that building. The battery box will require a weatherproof cover so that rain will not get into the box. This has been logged as an action to be completed by 30/11/2020



batteries in the building

There was no Waste Electrical and Electronic Equipment (WEEE) observed on site.

The site manager is due to attend his WAMITAB course. Once the course has been taken and passed can you ensure a copy of the certificate is sent to NRW regulating officer as soon as it has been issued.



Segregated metals



Path leading to the far end of the yard



scrap metal pile observed in the yard

Condition 4.2.2 of your permit requires you to submit within one month of the end of each quarter, a summary of waste quantities and types accepted on to and removed from site for that quarter.

Waste returns were checked for the site - there are no waste returns on our database for Dobbins Ltd since June 2019.

Action Required: The missing quarterly returns for Q3-4 2019 and Q1-3 2020 must be submitted to waste.returns@cyfoethnatriolcymru.gov.uk no later than 30th of November 2020

Thank you for your time during the inspection, please find my contact details below.

Regards

Steven White

Senior Environment Officer (NE 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.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.