

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

Site	A S H Bretton Recycling Centre	Permit Ref	VP3794FN		
Operator/Permit holder	Alan's Skip Hire Limited				
Regime	Waste Operations				
Date of assessment	26/06/2018	Time in	15:25	Out	15:45
Assessment type	Site Inspection				
Parts of the permit assessed	Accident, emergency and incident planning; Dust/fibres/particles				
Lead officer's name	White, Steven				
Accompanied by					
Recipient's name/position	Neil Hassel/Steve Rymill/ Director/Compliance Manager	Date issued	02/07/2018		

### 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
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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**If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response**

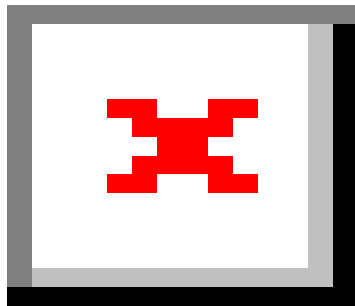
## Section 2 – Compliance Assessment Report Detail

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 an unannounced inspection following a number of reports to Natural Resources Wales regarding dust complaints from the site; Regulating Officer Steven White attended and met with John Dennon who accompanied throughout the visit, we were later joined by Steve Rymill. The weather was very hot, dry and there was a slight breeze.

On arrival I observed that dust suppression measures were operational with water being sprayed on the entrance and exit to the site, there was no signs of dust leaving the site at this point. I introduced myself to the site and discussed the issue with John Dennon who explained that there had been a dust issue earlier but extra measures had been put in place to combat it. Due to the hot, dry weather the 'BlueMAC' machine had produced fine dust during its operation, the trommel fines had also produced some dust which was evident on the netting surrounding the fines pile (see photo below).

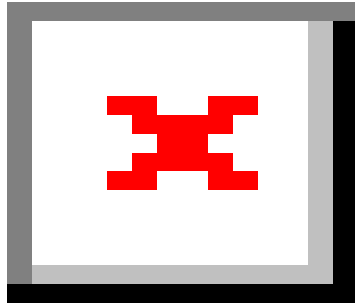


Trommel fines leaving the sorting shed - the dust collected on the netting and the difference in colour on the piles is visible

As soon as it was observed that site operations were causing a dust issue that was leaving the boundary the dust suppression measures were activated, it was found that these were not having the desired effect on the amount of dust produced so operations (at the 'BlueMAC' and trommel) were halted. During the site visit we were joined by Tim Bailey Sr who explained that, once it was found that the standard measures weren't having the desired effect, he put in an additional suppression measure of hosing the trommel fines prior to them leaving the sorting shed. This additional measure decreased the amount of dust produced from this area of the site and the impact is shown by the photo above where the trommel fines are a darker colour and were not producing any excessive dust whilst I was on site. It may be worth looking into incorporating this measure of hosing the trommel fines into standard site procedures for combatting future dust issues.

Due to the type of activities that are carried out dust issues from the Bretton site are not uncommon in periods of hot/dry weather however, there are adequate suppression measures in place and if they are found not to be sufficient then site operations are halted until the issue subsides. As discussed on site this is what I would have recommended be put in practice on this occasion and have no issues with the incident planning for the site, it should also be recognised that site operatives (Tim Bailey Sr) put in extra measures to reduce the impact off site.

The site diary was inspected and the dust levels and their impact was noted in there (See photo below). Steve Rymill attended site soon after I arrived and showed me correspondence over the past couple of weeks with regards to purchasing additional dust suppression (dust cannon) for the site.



Site diary logging dust levels and stopping operations.

Whilst the site EMS (Version 4) includes measures on tackling excessive dust (Section 4.4) produced on site it does not go into as much detail as previous EMS versions; when the EMS is next updated it would be worth including a more detailed section on dust and relevant suppression measures (e.g. above control/containment) as is done with 'breakdowns and spillages' and 'control of odour' in the EMS.

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

Regards

A handwritten signature in black ink, appearing to read 'Steven White', enclosed in a rectangular box.

**Steven White**

**Environment Officer (Waste Regulation Team)**

Direct dial 03000 653 913

Email: [steven.white@naturalresourceswales.gov.uk](mailto: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\_NRW0033544**

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Site	A S H Bretton Recycling Centre	Permit Ref	VP3794FN
Operator/Permit holder	Alan's Skip Hire Limited	Date	26/06/2018

### 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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### 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](mailto: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.