

Compliance Assessment Report

Report ID:
CAR_NRW0033560

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

Site	ASH Wrexham Recycling Centre	Permit Ref	WP3094FB		
Operator/Permit holder	Alan's Skip Hire (Wales) Ltd				
Regime	Waste Operations				
Date of assessment	15/06/2018	Time in	10:45	Out	12:00
Assessment type	Site Inspection				
Parts of the permit assessed	Specified by permit; Accidents, emergency and incident planning				
Lead officer's name	White, Steven				
Accompanied by	Challender, Paul				
Recipient's name/position	Neil Hassel/Steve Rymill/ Director/Compliance Manager	Date issued	06/07/2018		

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
A1 - Specified by permit	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
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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

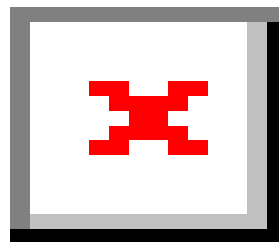
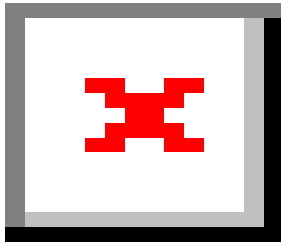
This was an arranged visit to carry out an audit on the site Fire Prevention and Mitigation Plan (FPMP), the most recent version (version 2.2) on file was submitted to NRW on 27/09/2017. The audit was carried out by Regulating Officers Steven White and Paul Challender. Steve Rymill, Keith Morris, Danny Flood and H&S manager Bernie Carr accompanied officers throughout the audit.

The following aspects of the site FPMP were assessed and observations are detailed below:

Sources of ignition

The main sources of ignition present at the site are: Boilers & drying floor; Drying skips; Overheating/malfunctioning plant/equipment; Self-combustion of waste stacks; Vandalism.

Waste on site (if stored outside) is segregated into bays by 'lego brick' type blocks, this provides adequate fire breaks between stacks and the locations of each waste type is clearly marked on the site FPMP.



Lego-type bricks used for bays segregating different waste types and grades of wood

There is a quick throughput of material on ASH with combustible wastes not stored on site for longer than a few weeks, the risk of self-combustion is low (but not impossible), movements of waste off site for recovery/energy are logged.

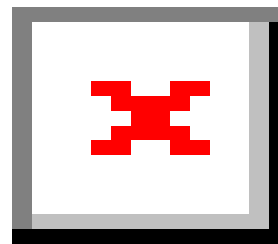
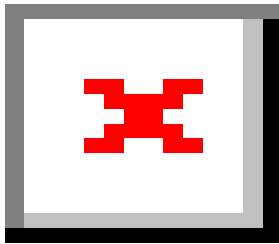
The site is accessible via Redwither road at the front and also by an access road along the south of the site should this be easier for NWFRS. The site is covered by 16 CCTV cameras (11 static and 5 mobile) that can be viewed remotely by various staff members, an alarm is sent to those staff should one of the cameras detect unusual activity (although this is usually a curious badger). There is secure fencing around the perimeter of the site.

ASH H&P and drying skips

The boilers and drying beds are covered by a Local Authority Part-B permit under a separate company (ASH Heat and Power), however they are a part of the site FPMP so will be covered in this audit.

There are two boilers which feed into the building at the south-eastern end of the site; these feed warm air into the drying beds in the building to reduce the moisture content and increase the calorific value of the waste; and feed warm air into the 10 drying skips situated nearby for the same purpose. This area is one of the more likely parts of the site that could be more susceptible to ignition due to the heat treatment being carried out. Subsequently ASH have installed a number of CCTV cameras in this area to monitor the boilers, beds and skips. There are automatic sensors in the drying shed and skips that detect increases in temperature notifying the relevant staff of any issues with the

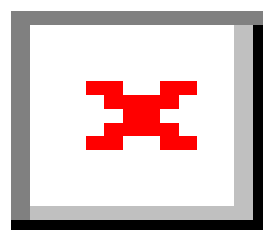
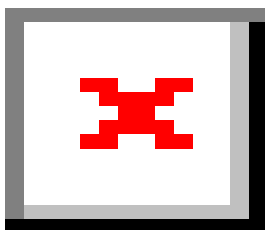
waste temperatures. Sprinkler systems in the drying shed and a 10,000l tank provide adequate water supply for the sprinklers to combat any ignition in the shed and skips as a 'first-aid' prior to attendance by NWFRS should it intensify.



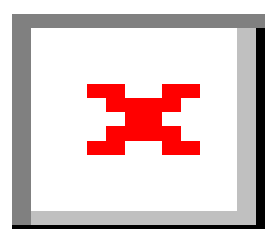
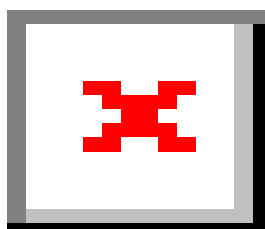
Inside drying shed showing sprinkler (red pipe) and input from boiler1

Danny Flood has suggested a heat-diversion valve to be installed in the outlet to the drying floor (see photo above) so that any heat from the boiler can be diverted immediately if required; contractors have been consulted on this proposal.

The drying skips are fed separately by warm air from boiler2, they are staggered and easily moved away from each other if one (or more) should catch fire. Each has temperature sensors and water system for heat/fire suppression and quick-release latches for emergency removals.



Boiler feeding (staggered) drying skips



Water supply and heat sensors on drying skips

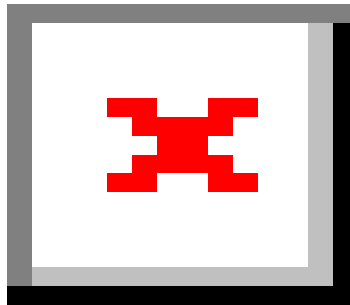
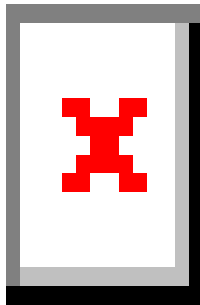
There is a detailed flow diagram (section 3.2) for what staff should do in the event of a fire in the FPMP; this was

implemented successfully on 19/04/2018 when there was a small fire in one of the drying skips; the site procedures for this were implemented and the fire was out within ~ 3/4 hour of first being spotted.

Plant/equipment failures are covered in the FPMP and if they result in a fire then the flow diagram in section 3.2 details site procedures to follow.

Water supply, hydrants and drainage

Water hydrants are coloured yellow and easily accessible on site, there is also a 10,000 litre tank to the rear of the drying shed. All the site drains to an interceptor (photo below) with a 20k litre capacity, this was last checked approximately 1-2 months prior to the audit. There is a penstock valve on the drainage system (see drainage map - Appendix D) situated at this location.



Site drainage and interceptor/penstock location

Emergency plans & staff training

Site emergency plans are kept in the site office and are available to all staff on request, there are 4 fire marshals on site and 13/14 of the staff have had some fire training (provided by 'Fire Line') and a 'toolbox talk' is available for on-site contractors. The last fire drill on site (prior to the audit) was carried out on the 7th May.

The FPMP in place at ASH Wrexham is satisfactory for the site and the recent fire in the drying skip shows that procedures and training put in place are working well. FPMP's (like the site EMS) are fluid documents and any changes to the site infrastructure or the way fires are dealt with on site must be included in an updated version.

In addressing the points raised above it should not be relied upon to mean that the measures are considered to represent appropriate measures covering every eventuality through operation of the permit. Your FPMP should be kept under constant review to ensure measures remain effective. You must also ensure that the plan is fully implemented on site at all times. The plan should be revised where necessary in accordance with Section 24 - Reviewing and Monitoring your Fire Prevention & Mitigation Plan of the guidance.

In a future compliance assessment visit, we will undertake an assessment of your compliance with your FPMP.

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

Regards

Steven White

Environment Officer (Waste Regulation Team)

Direct dial 03000 653 913

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:
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Site	ASH Wrexham Recycling Centre	Permit Ref	WP3094FB
Operator/Permit holder	Alan's Skip Hire (Wales) Ltd	Date	15/06/2018

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.

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.