

Compliance Assessment Report

Report ID:
CAR_NRW0034403

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	10/12/2018	Time in	14:00	Out	14:35
Assessment type	Site Inspection				
Parts of the permit assessed	Staff competency/training;Management System and operating procedures; Materials acceptance; Storage, handling, labelling and segregation; Accident, emergency and incident planning; Dust/fibres/particulates; Deposits on road; Reporting and notification; Records of activity, site diary				
Lead officer's name	White, Steven				
Accompanied by					
Recipient's name/position	Neil Hassel/John Dennen/Steve Rymill/ Directors/Compliance Manager	Date issued	21/01/2019		

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	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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 unannounced inspection carried out by regulating officer Steven White who was accompanied on site by John Dennan.

As this visit was carried out during a quiet time of year for the site the opportunity to put in some upgrades and work on the yard and picking lines was being carried out; as such there was no sorting of waste going on whilst I was on site - waste was being dropped off but not picked through.

The picking line was turned off at the time of the visit so that maintenance could be carried out on the machinery and a clean up operation of the building was in process. The pile of waste (prior to sorting) was a lot smaller than on previous inspections (see photo comparison from visit in June 2018 below)



June 2018/Dec 2018

The yard adjacent to the sorting building was undergoing renovation work including a new interceptor and new concreting of this yard was being undertaken. This area is primarily for the storage/parking of wagons and the addition of new concrete instead of hardstanding will (hopefully) reduce the amount of dust generated and dirt on the access roads from the wagons entering and exiting site. It is estimated that (weather dependant) this work will be complete towards the end of January 2019.

During discussions with John Dennan I asked if the newly concreted area was part of any plans for future expansion of waste operations into this part of the site - John said that there were no plans to do this. If circumstances change then you will have to vary the site permit to show this and the site EMS and FPMP will require changing; however this is only if the site waste operations expand into this area.

There were no sorting/treatment operations going on at the time of the inspection so renovation work had been carried out on the railings next to the conveyor and was due to be carried out on the outside panelling of the building. See photos below



Conveyor line railings and panelling

The site recently underwent its ISO auditing and gained accreditation for 9001, 14001 and (OHSAS)18001. The site employees are also going through a number of different training courses and improvements to the BlueMac machine's dust abatement measures have been put in place. See photos of additional sheeting around the machine below.



BlueMac machine with extra sheeting

The site diary was checked and the COTC for the site attended more than the minimum required amount. advice on potential new Technical Competence schemes for ASH has been sent separately to Steve Rymill.

Waste Returns for the site were checked - no issues were found.

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

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Operator/Permit holder	Alan's Skip Hire Limited	Date	10/12/2018

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.