

Compliance Assessment Report CAR_NRW0038350

Permit being assessed: WP3094FB.

For: ASH Wrexham Recycling Centre, held by Alan's Skip Hire (Wales) Ltd

At: Site One, Redwither Road, Wrexham Industrial Estate, Wrexham, LL13 9RD.

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

On 25/05/2021 between 16:10 and 17:15.

Parts of permit assessed: 'Specified by permit'; Containment of stored materials; Materials Acceptance, Storage, Handling, Labelling & Segregation; Fire Prevention Mitigation Plan

NRW Lead Officer: Sarah Walton, accompanied by Kathryn Bradshaw.

Report sent to: Neil Hassell / Thomas Farrell, Director / Compliance Manager on 08/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	

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?

No action required.

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 25th May, Waste Regulation Officer, Sarah Walton and Hazardous Waste Regulation Officer, Kathryn Bradshaw, conducted a routine un-announced inspection on site.

Thomas Farrell and Danny Flood greeted officers and accompanied them throughout the inspection.

The weather was warm and breezy at the time of the visit. The site was relatively quiet due to it being late afternoon meaning most operations had ceased for the day.

It was explained that Sarah would be taking over as the site's Regulating Officer so this inspection was mainly an introductory visit to have a look around the site and understand site operations.



The MRF Building was inspected first. Discussions were had over the fire that occurred here the previous year. Since the fire, the building has been re-cladded and now benefits from thermal imaging cameras with 3 in the MRF Building. This allows for temperatures of the waste to be constantly monitored which is connected to an alarm system should the temperature rise above normal levels.

Waste was clearly segregated into the separate bays and is stored for a maximum of 5 days.

It was mentioned that the site's Fire Prevention and Mitigation Plans are readily available on site. There are 2 copies which are kept at either end of the site for ease of access. There are also 2 fire hydrants easily accessible.

Officers also discussed site drainage with Mr Farrell. All waste on site is stored on impermeable concrete within a sealed drainage system. This drainage is connected to the site's interceptor. The interceptor is not currently inspected or maintained but there are

plans to start routine maintenance at intervals of roughly once every 12 months.

Officers continued to walk around the site, observing different bays which stored items such as plasterboard, glass and PAL metal waste. All waste was stored within the height & perimeter of the bays.



The Dwr Cymru Sludge was causing an odour and was attracting a number of birds. Danny mentioned that they have regular inspections by pest control services and have bait boxes dotted around the site. No issues have been noted recently from these inspections.



The drying bins and drying beds at the rear of the site were checked. Danny explained that currently there was approximately 30 tonnes on the drying floor and 45 tonnes split between the drying bins. This is just within the daily maximum tonnage of waste that can be heat treated on site (75tonnes). Each drying bin has a water connection and the temperatures are regularly monitored.

Before leaving site, officers had a look through the site's Fire Prevention Mitigation Plan and EMS.

Thank you to staff for their time and co-operation throughout the inspection.

Should you wish to discuss or clarify anything in this form, please make contact using the details below.

Kind Regards,

Sarah Walton
Waste Regulation Officer
03000 654 791
sarah.l.walton@cyfoethnaturiolcymru.gov.uk

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.