

Compliance Assessment Report CAR_NRW0038609

Permit being assessed: TB3397TD.

For: GTR Aggregates and Recycling Limited, held by GTR Aggregates & Recycling Ltd
At: Waste Transfer Station, Dee Bank Industrial Estate, Boot End, Bagillt, Flintshire, CH6 6HJ.

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

On 10/08/2021 between 14:00 and 14:40.

Parts of permit assessed: 'Storage, Handling & Segregation'

NRW Lead Officer: Sarah Walton, accompanied by Steven White.

Report sent to: Ben Entwistle, Operations Manager on 13/08/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	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
C4	Outstanding action from previous CAR form to submit to NRW volumes of inert waste currently being stored on site.	27/08/2021
B3	Submit to NRW, evidence that a drainage survey has been arranged along with estimated dates for completion.	27/08/2021

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

Natural Resources Wales officers Sarah Walton and Steven White visited site on 10th August and met with Ben Entwistle. The purpose of this visit was to assess compliance with the steps laid out in the partial permit suspension notice which was issued to site on 29th July 21.



Photos 1 & 2 of transfer building which contains Household, Commercial & Industrial waste

As can be seen from the photos above, the volume of waste being stored in the building has been brought down significantly. Waste is also being stored at a height of 2.5m or below, which officers were pleased to see. It was mentioned when on site that ideally, the site should strive to work below maximum heights so that it is not always working at capacity, but instead has room to accept more waste in order to work more efficiently. This will also help prevent any further breaches to permit conditions. Furthermore, if waste is brought down below the height of the concrete bays, this will help reduce spread of a fire

should any waste ignite.

There are plans to empty the middle bay so that this can act as a natural fire break. Ben mentioned that there is currently approximately 170-180 tonnes of Household, Commercial & Industrial waste being stored on site. This is a great improvement and below the maximum permitted amount of 500 tonnes.



Photo 3: bay storing bin bag waste



Photo 4: skip waste in transfer building

The images above show how bays are starting to be used to segregate incoming waste streams. Skips are tipped at one end and then cardboard, wood and plastics are picked out. The rest of this waste is taken off site.

The fourth image shows waste is slightly spilling outside of the building. Ensure that waste is kept within the pillars of the transfer building.



Photo 5 showing Recycling Building (DMR Shed)

There was still a substantial amount of cardboard and plastic waste being stored within the Recycling Building. Ben explained that this waste will be baled which is set to commence on Monday (16th August). Plans are to completely empty this shed and demolish the building.

Officers were informed that the site's EMS was in the process of being drafted.

It had been discussed on previous visits that site operations have changed somewhat and that the site's working plan was being updated to reflect those changes. Please submit to NRW a copy of the most up to date version of the Working Plan so that this can be reviewed.



Photo 6: Inert storage area

Photo 6 shows that there is still a significant volume of inert waste being stored on site. The maximum permitted volume of untreated inert waste that can be stored on site is 2,000 tonnes. There is an outstanding action from the previous CAR form to submit to NRW,

evidence of the volumes of inert waste currently being kept at site. A repeat action has been noted on this form.

Following the completion of the inspection, officers were pleased to be able to lift the partial permit suspension. There is one outstanding action which is the completion of a Drainage Survey. As we appreciate this may take some time to complete, we are willing to accept this at a later date. We are awaiting confirmation from GTR that this survey has been arranged along with estimated dates for completion.

We are pleased that the site has taken this matter seriously and worked hard to bring the site back into compliance. NRW has received a commitment from GTR as to how they intend to manage waste volumes and storage going forward. This will be closely monitored. We must remind you that should these issues occur again, the site could face further suspensions of the permit, which could eventually lead to the permit being revoked. It is within your interests to keep on top of site operations to ensure that permit conditions are being complied with.

Thank you once again to staff for their time and cooperation throughout the inspection.

If you would like to discuss this CAR form or any other matters, please get in touch using the contact 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.