

Compliance Assessment Report CAR_NRW0038832

Permit being assessed: KB3433RY.

For: Alan's Skip Hire Ltd, held by Alan's Skip Hire Ltd

At: Weighbridge Road, Deeside, Flintshire, CH5 2LL.

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

On 13/10/2021 between 15:00 and 15:45.

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

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

Report sent to: Thomas Farrell, Environmental Compliance Manager on 26/11/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	C3 Minor	2.3.1 A - (3.5.1 of site's EMS)
C2 - General Management - Management system and operating procedures	Action only (X)	
C3 - General Management - Materials acceptance	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
1	4

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
B4	Ensure that all fuel and other oil/chemical tanks are stored within a double skinned container / with impermeable bund which is capable of containing 110% of the volume of fuel stored in the tank.	05/11/2021
C2	Submit to NRW, a revised and updated version of the site's EMS and Waste Recovery Plan.	17/12/2021
C3	Submit to NRW, evidence of the total volume of waste deposited at site to date.	05/11/2021

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

On Wednesday 13th October, Waste Regulation Officer, Sarah Walton and Hazardous Waste Officer, Kathryn Bradshaw, met with Neil Ecclestone to conduct a routine unannounced site inspection.

The weather was cloudy and overcast at the time of the visit. Upon entry to the site, there was no one present at reception. Officers had a quick look at the oil storage area before making their way further on to site.

Permit Condition 2.3.1a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2 (EMS condition 3.5.1 - Fuel Chemical & Storage).



Photos showing fuel tank and bund

There was a blue tank which looked to be holding diesel/other fuel. The bund was in a poor state, filled with oily liquid and a variety of rubbish material. This should be cleaned and emptied as soon as possible. The integrity of the bund should also be checked to ensure it is fit for purpose and water tight. Because the bund is already holding liquid, should there be an oil spill, the bund may not have sufficient capacity to hold the leaked fuel. The bund should be able to hold 110% of the capacity of the oil tank above. There are also oil stains on the ground around tank. Care should be taken to avoid any oil spillages to ground that may pollute the environment.



Photo showing an IBC storing Hydraulic Oil

In addition to this, there was an IBC (Intermediate bulk container) storing hydraulic oil. This container was not bunded. There should be a bund for this container which can hold 110% capacity of the IBC. **The site has been scored CCS Category 3 for breach of this permit condition regarding storage of fuels and oils.**

Following the checks on oil storage, officers walked down to the rear of the site where there was activity taking place.

Neil greeted officers and basic introductions took place. Neil gave an overview of current site activities. The site was in the process of excavating material and digging down to reach the Titanium Works beneath. No construction was taking place and Neil was unable to tell us when this was expected to begin.





Photos to show inert waste treatment and resulting 6F2 product

As can be seen from the photographs above, the main activity taking place on site was through the inert processing facility. Waste is brought onto site from ASH's Bretton site where it is then sorted with contaminants being removed. It is then processed (crushed and screened) and then sold on.



Photo showing accumulation of metal waste on site

Officers continued to walk around the site and observed a variety of different inert wastes deposited around the site. Some wastes were clearly yet to be treated and some were contaminated with metals and plastics. There was a large build up of metal waste on site. Neil explained that metals and general wastes were picked out of the inert waste and that this is the only waste that is removed from site. Ensure that such waste is routinely removed from site and not allowed to be stockpiled.

The site's Environmental Management System dated 2013 (EMS) and Waste Recovery Plan dated 2012 (WRP), are somewhat outdated and in need of review to ensure they still reflect current activities and plans for the site, in line with the site's permit. **Please could these be submitted to NRW by Friday 17th December.**

Neil explained that there was no weighbridge on site and that all records were kept at head office for the loads of waste brought on to site. **As an action, please confirm the total quantity of waste deposited at site to date.**

The inspection concluded at approximately 15:45.

I would like to thank Neil for his time and co-operation throughout the inspection.

Should you have any queries or wish to discuss this CAR form, please get in touch using my 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.