

Compliance Assessment Report

Report ID:
CAR_NRW0035277

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

Site	Globe Way Recycling Park	Permit Ref	BP3291EB			
Operator/Permit holder	Flintshire County Council					
Regime	Waste Operations					
Date of assessment	19/06/2019	Time in	11:20	Out	11:40	
Assessment type	Site Inspection					
Parts of the permit assessed	See below					
Lead officer's name	Challender, Paul					
Accompanied by						
Recipient's name/position	Ruth Cartright/Katie Wilby/ Regulatory Services Manager/Service Delivery Manager	Date issued	24/06/2019			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E5 - Emissions - Waste	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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
-----------------------------	---	---	---

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. The inspecting Environment Officer (EO) Paul Challender was in the area to conduct an inspection on another adjacent Flintshire County Council permitted waste site when it was noticed that the public were being turned away from the recycling park. On enquiring with a site operative the reason for the closure it was stated that the site had been vandalised and that they were in the process of tidying the damage. Therefore, the site was entered to assess. During the inspection the weather was mild and overcast after period of several days of heavy rain. During the inspection the inspecting officer was accompanied by Gabrielle Povey of Flintshire County Council who had also attended at this time due to the vandalism on the site.

The site had been accessed by persons who normally enter to remove items of WEEE, especially televisions, batteries and any other items of perceived value. This access is picked up on the 24 hour monitored CCTV system and challenges are issued on a public address system. Portions of the CCTV system have however, been damaged and/or destroyed at various locations around the site and on this occasion the waste paint store had been accessed and paint had been thrown around the site and graffiti daubed on the walls.



Relevant supervisory staff for Flintshire County Council had arrived to deal with the situation and site operatives were engaged in traffic management to redirect the public to other recycling centres and also in the clean up of the paints on site.

The relatively recently redesigned site was built defensively in light of historic trespass, theft and criminal damage. The site benefits from well thought out security arrangements which have been circumvented. These arrangements include 24 hr monitored CCTV with public address system, high unperforated concrete slab walls topped with spikes and effectively a 'moat' around the perimeter of the site which creates a 12 foot height difference.



Unfortunately, an adjacent business has conducted some development work which, has altered the ground levels at one corner of the site. This has in turn allowed easier access over the perimeter wall and the wall spikes have been damaged by intruders to ease access. The CCTV system has been damaged or completely destroyed in places. The site is regularly accessed by 'rooters' at present.

All unauthorised access is logged in the Site Diary, the CCTV system is part of a service agreement and is due to be assessed and repairs implemented. In addition the alteration to the ground level at the rear of the site is being addressed in consultation with the neighbouring business. Also, the council is considering its options in relation to the acceptance and/or storage of waste paints at this site. The council is also in full consultation with North Wales Police in relation to the problems at the site.

Please ensure that ongoing remediation to damaged security features is implemented as soon as practicable.

Thank you for your time during this inspection.

Paul Challender - Environment Officer (Waste)

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:
CAR_NRW0035277**

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

Site	Globe Way Recycling Park	Permit Ref	BP3291EB
Operator/Permit holder	Flintshire County Council	Date	19/06/2019

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.