

Compliance Assessment Report

Report ID:
CAR_NRW0034850

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

Site	ASH Wrexham Recycling Centre	Permit Ref	WP3094FB		
Operator/Permit holder	Alan's Skip Hire (Wales) Ltd				
Regime	Waste Operations				
Date of assessment	14/08/2019	Time in	14:40	Out	15:30
Assessment type	Site Inspection				
Parts of the permit assessed	Specified by permit; Site drainage engineering; Staff competency/training; Management system and operating procedures; Storage, handling, labelling, segregation;Site security; Accident, emergency and incident planning; Emissions; Amenity; Monitoring and Records				
Lead officer's name	White, Steven				
Accompanied by	Henderson, Amy				
Recipient's name/position	Neil Hassell/Steve Rymill/ Director/Compliance Manager	Date issued	06/09/2019		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E3 - Emissions - Surface water	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	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 site inspection carried out by Environment Officers Steven White and Amy Henderson. Officers arrived on site and met with Keith Morris and Danny Flood, who accompanied us throughout the visit. The weather at the time of the visit was a dry spell in-between heavy showers that day. The site was fairly quiet at the time of the visit with little waste-treatment activity being carried out, Keith explained that this was as officers had arrived during the changeover period between staff.

Site Drainage Engineering (Clean & Foul)

The site benefits from sealed, concrete-covered drainage and a large (50,000L) interceptor for contaminated surface water. This is checked and maintained regularly with any maintenance/breakdowns logged in the site diary along with other machinery maintenance.



Concrete yard

General Management

Storage - Waste was segregated into separate streams (wood, metals, sludge from Dwr Cymru, chipboard) and stored within the relevant bays constructed of 'lego-brick' type blocks (see photo below). There were no anomalous wastes observed on site during the inspection and the stored waste did not exceed the height/perimeter of the bays.



Waste segregated by 'Lego-Brick' bays, Dwr Cymru sludge

The boilers are permitted under a Local Authority Part-B permit and waste wood was separated into category A & B piles (a categorisation system that NRW does not adhere to). The 'A' wood pile is being used solely for the Part-B permitted boilers, category 'B' wood that was assessed as suitable for fuel was also used for the boilers, waste wood that is not used for fuelling the boilers is removed from site.

The drying beds (see photo below) linked to the boilers can cope with a capacity of ~40T but a good level of ~30T has been found that takes approx. 12 hours to dry the waste to 16-18% moisture reduction. This higher-calorific valued waste is then sent to Viridor/Lancashire Fuels for incineration as Energy from Waste (EfW); no more than 75T per day is to be pre-treated in the drying beds (this includes re-blending of waste and dried waste) prior to incineration, as stated in Schedule 1 of the site permit. If this 75T limit is consistently exceeded, then ASH will be required to vary the permit to an Installation.



Drying beds and bins

Staff Competency and Training

Danny Flood is nearing completion of WAMITAB qualification and will soon be logged as another Technically Competent Manager (TCM) for the site, as soon as the relevant certification is received this is to be forwarded to Steven White.

Incident Management

The 2 drying beds benefit from temperature-monitoring & spray systems and the 9 drying bins use a probe-text alarm system that alerts staff if temperature rises to a level that could pose risk of ignition. If there is no response from ASH staff from one of these alerts then NWFRS are contacted for attendance. The following parts of the site FPMP discussed: Access for NWFRS; Potential ignition sources; Hydrants and water supply; Fire suppression measures and; Training for staff.

A 5m high netting fence (see photo below) surrounds the site to prevent debris escaping CCTV security system is in operation with 16 cameras covering the majority of the site and monitored by contractors off-site when the site is not operating. The site is covered by a night-shift who regularly carry out security checks



Perimeter fence

Emissions

The Redwither Brook (see photo below) was checked – as there had been recent, sustained heavy rain the stream was discoloured, there was no evidence that this discolouration was from ASH



Redwither Brook

Amenity

Dust - The dust cannon (see photo below) was not operating at the time of the visit and as the site was already wet due to heavy rainfall earlier in the day, there was no evidence of any dust issues from site. Since the updating of the Dust Management Plan and re-siting of the wood piles there have been no dust complaints relating to ASH Wrexham



Dust cannon

There was some odour in the vicinity of the main sorting shed (see photo below) but this was not evident as you moved away from the building, no odour was observed off-site



Main sorting shed

Pests - Some seagulls observed on roof of buildings; this is currently being managed, ASH have tried different methods to deter the birds, however some still persistent. No evidence of any other vermin seen – pest control services regularly put poison down for rats.

Monitoring & Records

Site diary checked - this was up to date.

Waste returns for Q1 & Q2 2019 (Jan-Mar/Apr-Jun) were checked

No breaches of the environmental permit were observed whilst on site.

Thank you for your time during the inspection, please find my contact details below.

Regards

Steven White

Senior 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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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.