

Compliance Assessment Report

Report ID:
CAR_NRW0032952

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	22/02/2018	Time in	14:55	Out	15:20
Assessment type	Site Inspection				
Parts of the permit assessed	Specified by permit; contain,emt of stored materials; Staff competency/training; Materials acceptance; Storage, handling, labelling and segregation; Accident and emergency planning; Dust/fibres/litter				
Lead officer's name	White, Steven				
Accompanied by	Amos, Lucy				
Recipient's name/position	Harvey Mitchell/ Waste Manager	Date issued	28/02/2018		

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	C3	Table 4.6 d
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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 visit by Regulating Officer Steven White and Environment Officer Lucy Amos, we were accompanied around site by Richard Jones.

The site was clean and tidy, a preliminary inspection of the site boundary showed that there was no litter that had blown off site, or if it had it had been promptly collected.

The Chemsafe was inspected - this was closed and had no evidence of recent spills around it. The oil stores were also checked - there were no spills visible and adequate spill kits were available on site for any eventuality.



Paints are stored in open-topped IBC's - these are open to the elements and can collect rainwater as shown in the photos below, when questioned site operatives said that the contractor who picks the paints up takes the whole IBC (rainwater included) when it is collected. However (although the IBC's were sealed units, there were no spills and were stored on concrete) the permit condition that covers the storage of liquids stated that:

Table 4.6 d) Wastes that are in a form that is either sludge or liquid: These wastes are only permitted if stored in liquid-retaining, covered containers.

This has subsequently been scored as a CCS C3 breach of the permit against the relevant condition (a1: As specified by Permit)



Paint storage (open-topped IBC's with no cover, and rainwater collecting in the containers)

Other Flintshire CA sites (E.g. Mold) use a weighted tarpaulin to cover the open-topped IBC's to stop rainwater from entering the containers. The potential for a more significant environmental impact if there is rainwater in these IBC's increases from e.g. vehicle strike. It is advised that the paint stores are covered at the nearest opportunity; a date of 4 weeks from the issue of this CAR form has been set (that is by 29th March 2018) for this breach to be brought back in compliance.

Asbestos skip checked - this was closed with no asbestos waste outside.



Asbestos skip

There were approx. 25 large electrical appliances on site, these are to be collected at the nearest available opportunity as the storage space was close to full; see photo below:



Large WEEE storage

The gypsum/plasterboard skip was full at the time of the visit - this needs emptying and collecting immediately (a 'not in use' sign was on display).

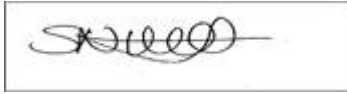


Gypsum/plasterboard skip - requires collection

Site operatives were helpful and had a good understanding of site operations when questioned.

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

Regards

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'Steven White' written in a cursive, flowing style.

Steven White

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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Site	Globe Way Recycling Park	Permit Ref	BP3291EB
Operator/Permit holder	Flintshire County Council	Date	22/02/2018

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			
A1	C3	Paint stores (and other liquid/sludge stores) must be covered.	29/03/2018

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.