

	EPR Compliance Assessment Report	Report ID: 37211/0239807			
This form will report compliance with your permit as determined by an NRW officer					
Site	A S H Wrexham Recycling Centre		Permit Ref	37211	
Operator/ Permit holder	Alan's Skip Hire (Wales) Ltd				
Date	20/05/2015		Time in	14:05	Out 16:20
What parts of the permit were assessed	The CAR Sub-criteria listed below				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Neil Hassall (Director)				
Officer's name	Ross Briscoe, Louise Peel		Date issued	11/06/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	C3	2.1.1 (Schedule 1 - S1.1)
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	C3	1.1.1
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	C3	1.1.1
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	C4	1.1.1
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	4	Total compliance score (see section 5 for scoring scheme)	12.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

This was a routine planned site inspection. I was accompanied by Senior Environment Officer Louise Peel. We were both accompanied throughout the inspection at all times by Keith Morris (Site manager - Alan's Skip Hire) and Jan Edwards (Oaktree Environmental Limited). When within the site offices Neil Hassall (Director – Alan's Skip Hire) was also present.

Weather conditions were dry and overcast with a North Westerly breeze.

This was the first site inspection carried out since the variation to the environmental permit was issued (15.04.2015). The permit now incorporates the wood processing activities on site which were previously carried out under a T6 exemption. The annual tonnage of waste that can be accepted at the site has been increased to 74,999 tonnes per annum and hazardous waste codes have been removed.

Management documents have also been incorporated into the permit which the site will be regulated against.

The site was operational throughout the inspection with deliveries of incoming waste being made – predominately consisting of mixed waste being deposited into the main waste transfer building. Waste was now being processed within the main waste transfer building by manual techniques. The trommel and picking line is now no longer in use. Operations within the transfer station appeared well organised. Due to the changes made (removal of trommel and picking line) the rotation of waste is now more frequent helping to prevent the build-up of waste and thus reducing the likely hood of amenity issues such as odours and pests. It should be noted that all mixed waste was located within the main waste transfer building - an improvement from previous inspections.

Within the external storage areas improvements had also been made. Netting has now been placed along the full length of the far side boundary behind the wood chip storage bays (photograph 1) This is still being extended to the section of wall which juts out near to the wheeled bin storage area – this bay wall has also been increased in height to assist in trying to prevent any emissions from site operations impacting on neighbouring units.

The wood shredder has also been relocated further away from the boundary with Multipackaging Solutions and nearer to the inert waste storage area. In addition, water sprinklers have also been mounted on top of the netting in the vicinity of the wood shredder to assist in damping down site surfaces.

A stockpile of unprocessed wood was also located on site awaiting processing.

At the far end of the main waste transfer building all the external bays used for the storage of plasterboard etc were not giving rise to any concern – hardly any waste was located within these bays (Photograph 2).

The PAL waste processing plant was operational with material being processed through the plant. Observations are noted within the breaches section below but it should be noted that additional netting has been placed along the permit boundary to try and reduce any emissions off site (photograph 3).

Site drainage proposals were also discussed whilst walking around the site.

Litter, pests, vermin, odours, and mud were not observed throughout the inspection.

Following an inspection of the permitted area discussions were held within the site office relating to the regulation of the site, the permit and management systems, dust emissions, incident attendance, drainage proposals and future plans at the site.

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The site diary and inspection checklist were also inspected.

During the inspection the following breaches of the permit were observed and have been recorded.

B3 - Infrastructure (Site Drainage Engineering (Clean & Foul)), Permit condition 2.1.1 (Table S1.1), Compliance Classification Scheme Category 3 Breach.

As highlighted previously, site drainage continues to be an ongoing issue. Contaminated run off (from areas of the site being used to store waste material) is escaping from the concreted areas onto unmade ground (near to the boundary with MPS) In addition there is also the potential for contaminated run off to enter the Redwither Brook (Surface watercourse) via the gully drain next to the bridge over the brook - this is a direct point source discharge to surface water. Regulating officers are aware that large scale proposals are due to take place. In the interim measures should be put in place to prevent any potential discharge. Officers were also concerned in relation to a large pothole within the entrance way to the permitted site (photograph 4) and a pool of standing water at the front right hand side of the main waste transfer building which contained contaminated water (photograph 5) .

C4 – General management, Storage, handling, labelling and segregation, Permit condition 1.1.1. Compliance Classification Scheme Category 3 Breach.

Sections 4.8.10 and 4.8.11 of the dust management plan refer to the height of external stockpiles on site. The specified limit is 3m. As also stated the bay walls have been constructed to ensure that the height of the stockpile is lower than the wall for both dust and fire implications. As observed on site, the heights of the stockpiles were clearly in excess of this limit. Of particular concern was the height of the shredded woodchip located between the shredder and screener and also the PAL waste material stockpiled prior to treatment. The height should not exceed 3 m. Not only does the height give the potential for airborne emissions whilst untouched (wind-blown) but when the stockpiles are being moved by machinery at a height in excess of 3m the risk of dust emissions is greater due to bay walls being exceeded. Operatives on site should be aware of this limit, you may wish to consider a marker on the bays walls to indicate the 3m height limit. This limit is also stated in your planning permission.

F3 - Amenity (Dust/Fibres/Particulates), Permit condition 1.1.1, Compliance Classification Scheme Category 3 Breach.

As the officers inspected the PAL waste processing plant, dust emissions were observed being emitted from both the feed hopper area and the 360 grab used to load the material. Dust was being generated when the grab operative was picking up the woodchip from the stockpile. This action appeared to be being carried out without too much concern for dust generation. The grab was pulling the woodchip around then once being picked up it was slightly opening to release a small amount of wood chip thus creating dust (photograph 6). Once the material was then being fed into the hopper, dust was being generated as it dropped into the hopper. Section 4.6.2 of the dust management plan makes reference to the loading of feed hoppers using 360 excavators indicating that suppression and sprinklers will be available to spray areas on or around the machinery which are likely to give rise to dust emissions. In addition section 4.8.8 of the dust management plan refers to the use of water on stockpiles as an effective means of dust control. No water suppression was observed within this area. The dust was rising with the potential for impact of site.

G2 –Monitoring, Records, Maintenance and reporting: records of activity/site diary/event, Permit condition 1.1.1. Compliance Classification Scheme Category 4 Breach.

The site diary and inspection checklist was reviewed whilst within the site office. Your Environment Management System and Dust Management plan require you to record certain specified information, specifically in this instance relating to dust emissions at the site. Please refer to section 4.10.2 of your dust management plan for full details, however in summary details of twice daily inspections at the site perimeter for dust emissions by the site supervisor was not recorded and following recent complaints the complaints and events log had not been completed as stated within 4.10.4 of the dust management plan.

The dust management plan is an important document which must be followed - especially the monitoring and recording element. In the event of any complaint or follow up, regulating officers must be able to clearly see the documented actions taken and be confident that site operatives have taken all the required action specified within the plan. If there is no written documentation it makes complaint follow up difficult and allows for possible solutions to be missed. Following the permit variation please ensure that all staff responsible for documenting events on site are familiar with the requirements of the management system and dust management plan. Further inspections of onsite documentation will take place upon future inspections.

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As shown above and as discussed on site, a number of permit breaches were identified. A summary of the compliance scoring for this site inspection is shown below

B3 – Category 3 breach – 4 CCS points
C4 – Category 3 breach – 4 CCS points
F3 – Category 3 breach – 4 CCS points
G2 – Category 4 breach – 0.1 CCS point

Total 12.1 CCS points

Please keep me updated with any changes, plans, proposals or issues regarding the site.

Thank you for your time.
Regards

Ross Briscoe - Environment Officer
0300 065 3675
ross.briscoe@cyfoethnaturiolcymru.gov.uk

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.

Photograph 1



Photograph 2



Photograph 3



Photograph 4



Photograph 5



Photograph 6



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Operator/ Permit	Alan's Skip Hire (Wales) Ltd	Date 20/05/2015

Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	☐
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	☒
We will now consider what enforcement action is appropriate and notify you, referencing this form.	☐

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
B3	C3	Ensure that drainage system is compliant with permit condition. Whilst full drainage system overhaul is planned and developed ensure that interim measures are taken to prevent pollution (repair of potholes and large areas of standing water)	N/A
C4	C3	Reduce height of stockpiles on site and consider method for ensuring that operatives remain below this height when moving/adding to stockpiles	N/A
F3	C3	Implement appropriate suppression within PAL waste processing area as stated within dust management plan	N/A
G2	C4	Ensure that all daily inspections are completed and all complaints logs are also completed to meet requirements of permit and management system/dust management plan	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.