

Compliance Assessment Report

Report ID:
CAR_NRW0000098

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

Site	A S H Wrexham Recycling Centre	Permit Ref	WP3094FB		
Operator/Permit holder	Alan's Skip Hire (Wales) Ltd				
Regime	Waste Operations				
Date of assessment	23/03/2016	Time in	11:05	Out	12:40
Assessment type	Site Inspection				
Parts of the permit assessed	The CAR Sub-criteria listed below				
Lead officer's name	Briscoe, Ross				
Accompanied by					
Recipient's name/position	Neil Hassall/ Managing Director	Date issued	19/04/2016		

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)	C3 - Suspended	2.1.1
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	C3	3.4.1
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	2	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 a routine pre-planned site inspection. The officer was accompanied throughout the inspection by Keith Morris (Site manager – ASH Group) and Steve Rymill (Environmental & Compliance Manager – ASH Group).

Weather conditions were dry and overcast. The wind was light, blowing in the direction of the site offices and the neighbouring Enviroclear site.

Prior to entering the permitted area a short discussion was had beforehand within the site office relating to ongoing work at the Wrexham site, mainly around the site drainage infrastructure.

Within the permitted area wastes were being managed by site operatives within various areas of the site.

In the main external area, no wood processing operations were taking place. Pre-processed wood was stockpiled ready for processing and processed chipped wood was stored within the bays alongside the boundary wall of the permitted area. The height of the chipped wood material was all within the three metre limit. It was suggested that it may be useful to display the three metre height limit upon the bay wall in a visible format so yard operatives are aware of this requirement (3m height limit of chipped waste material). No dust emissions were observed emanating from this area – suppression was available but was not operational within this area throughout the inspection – no dust emissions were observed.

The PAL wood waste processing plant had been relocated since the previous inspection carried out at the site (03.12.2015). The feed hopper was now located within the main waste transfer building on the right hand side with half the processing equipment within the building and half located outside the building. Upon the plant located outside the building a misting suppression system was operational providing adequate suppression. No dust was observed to be emanating from this operation which was being undertaken on site throughout the inspection.

Waste materials (Plasterboard, grit screenings and inert material) were stored within the external bays at the far end of the main waste transfer building – no issues were noted regarding these bays.

At the far end of the permitted area, the civil engineering work required for the new drainage system had commenced. The open land was being made ready for further larger scale construction works over the coming weeks and months. In addition, the officer was advised that electricity cables within this area would be re-routed from their current overhead positioning to an underground route. This should hopefully be undertaken in line with the civils work being undertaken for the drainage. As advised on site if any waste material (currently stored on site or not) is to be used within the construction works taking place, an appropriate permit or exemption for its use must be in place prior to the activity commencing. Guidance on this point can be found via our website – www.naturalresourceswales.gov.uk

Within the main waste transfer building, mixed biodegradable waste material was being stored and processed immediately within the main access door to the building. The quantity of this waste material was fully contained within the building. A strong putrescible odour was noted when stood within this area which was attributable to this mass of waste material, an odour was noted outside of the permitted area, within the area of the site weighbridge. Appropriate measures were being employed by site operatives.

Throughout the inspection, litter, dust, and mud on the highway were not noted or observed to be a problem.

Elsewhere on site, the new fire hydrant located in the western corner was now installed and was fully operational. A new dust suppression unit had been acquired and was available for use on site – increasing the amount of suppression available.

The site diary and inspection checklist were also inspected, entries were up to date with relevant information regarding site activities.

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.

On site drainage remains an issue. Contaminated run off (from areas of the site being used to store waste material) can escape onto unmade ground. As noted above, works have now commenced to overhaul the entire drainage system of the permitted area. Whilst work is ongoing please ensure that appropriate measures are taken to reduce the risk of pollution. A Compliance Action Plan is now in place at the site with an agreement for the works to take place by a specified date. Whilst this Compliance Action Plan is in place, Compliance Classification Scheme scoring will be suspended for breaches associated to this issue only. A category 3 non-compliance has been recorded (suspended), should the Compliance Action Plan not be complied with the suspended scores will be reinstated.

F1 – Amenity – Pests/Birds/Scavengers, Permit condition 3.4.1. Compliance Classification Scheme Category 3 Breach.

Throughout the inspection a large number of seagulls were observed upon and flying around the site. The gulls appeared to be most apparent around and upon the main waste transfer building –settling upon the roof of this building and upon the external yard area clearly attributable to permitted waste operations. The gulls were also settling on the roofs of neighbouring business units. Appropriate measures should be taken to prevent and/or minimise the presence of pests on site. No measures were being taken whilst the visit was being undertaken. A Compliance Classification Scheme category 3 non-compliance has been recorded.

As detailed above and as discussed on site with Keith Morris and Steve Rymill, 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 (Suspended)

F1 – Category 3 – 4 CCS points

Total 4 CCS points

Please keep me updated with any changes, plans, proposals or issues regarding the site over the coming weeks and months, specifically in relation to the site drainage works.

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.

Please note this is an updated Compliance Assessment Report following the removal of a CCS score relating to odour emissions.

EPR Compliance Assessment Report

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Site	A S H Wrexham Recycling Centre	Permit Ref	WP3094FB
Operator/Permit holder	Alan's Skip Hire (Wales) Ltd	Date	23/03/2016

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.

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.

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			
F4	C3	Ensure effective pest control measures are in place to prevent and/or minimise pests associated with permitted activities	15/04/2016
B3	C3	Ensure that site infrastructure meets the requirements in order to effectively handle waste material on impermeable surfaces with sealed drainage	10/12/2016

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.