

Compliance Assessment Report

Report ID:
CAR_NRW0031124

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	25/01/2017	Time in	09:35	Out	10:30
Assessment type	Site Inspection				
Parts of the permit assessed	rdf process, permitted area				
Lead officer's name	Sowerby, Andrew R.				
Accompanied by	Paul Challender				
Recipient's name/position	Neil Hassall/ Steve Rymill/ Director/ Compliance Manager	Date issued	17/02/2017		

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	X	
F5 - Amenity - Deposits on road	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

The visit to site was pre-arranged. The aim of the "mini audit" is to attempt to establish any common industrial practices with regards to rdf and fines and ultimately to ensure that all companies in North Wales are producing, storing and classifying these wastes appropriately and consistently. This audit was done as one of a number of other similar visits being carried out at targeted permitted sites across North Wales.

I was accompanied to site by Environment Officer Paul Challender. We met Steve Rymill, Matt Kirk and Keith Morris on site. The visit was split into two parts. The first part involved completing a questionnaire and the second was an inspection of the site. A summary of some of the answers provided is below.

The site does not produce fines so the questions concentrated on the rdf (refuse derived fuel).

The main input into the rdf production process is mixed municipal waste (20 03 01). This waste is subjected to a crude sorting process, whereby there will be a couple of employees on the floor who will attempt to remove any obvious recyclable materials and non permitted wastes from the incoming waste (non permitted waste will include both non permitted wastes under the sites environmental permit and wastes from the unacceptable wastes list provided by the destination site). The waste is then passed through a shredder that also has an overband magnet. The magnet removes any bits of metal before the waste is shredded down to the required size.

It is believed that very little treatment of the incoming waste needs to be done as the waste should have been sorted at source by the waste producer. As a result it is believed that all reasonable measures have been taken to apply the waste hierarchy (condition 1.2.1 of your permit).

The resultant shredded waste is then stored for a short period of time, 24 hours maximum except at weekends when it may be a little longer, before it is taken away loose to the Viridor EfW site in Runcorn. This shredded waste or rdf should meet the contractual end user specification outlined by Viridor. This specification includes a calorific value, size and lists what wastes would be considered unacceptable.

ASH do not use a waste broker to arrange deliveries to the Runcorn EfW site. Tests of the rdf are carried out by Viridor. They will randomly take bucket loads of waste from the Wrexham site to test it. In addition to this they also carry out random spot checks on incoming loads to the site in Runcorn. ASH do not do tests themselves.

In the event where a load is rejected by Runcorn, ASH would return the waste to site to be resorted and dealt with. Any problematic waste streams would be diverted to landfill. To my knowledge no loads of rdf have yet been rejected by the Viridor Runcorn EfW site.

If Runcorn is unable to accept rdf, for example during occasional shut downs of the site, waste will currently be sent to landfill. However, should an alternative appropriate market become available this may change.

SRF (solid recovered fuel) has been briefly considered but my understanding is that the logistics behind producing it would not currently be worth the trouble.

I was informed on site that ASH currently accept around 120 to 130 tonnes per day of municipal waste which they then process into the equivalent amount (120 to 130 tonnes) of rdf to be sent off site each day.

Currently any rdf/shredded waste that leaves site is classified as 19 12 12. We have raised the question as to whether this is the most appropriate code or if 19 12 10 (combustible waste (refuse derived fuel)) should be used instead. We are hoping to get further guidance on the use of these EWC codes in the future and once we do we will provide feedback to you.

Following the questionnaire we were accompanied around site. During the walk around site we were shown the extensive improvement works that are now in the final stages of being completed. By the gateway, work has been undertaken to divert runoff away from the watercourse. As this is a chokepoint on site the work, which will involve some concreting, will be completed during a weekend when they can close the site. A drain has been inserted across the gateway and the plan is to install a sleeping policeman to divert runoff to a nearby drain as an extra measure. Large areas of the site have been cleared and concreted with sealed drainage laid down. There are some small sections of the site that still need concreting once cables have been laid. There is still some work to do around the edges of the site to ensure the site is contained but there should be no issues with runoff in the meantime as the concreted ground falls towards the drains. Waste is now being stored and treated further down the yard,

including the wood and the wood chipping operations. Mist cannons were still in use to try and reduce the dust in the air. Bays have also been placed along one side of the site in which waste is now being stored. We were also shown the gabion baskets that have been placed along one boundary of the site. These gabion baskets had been filled with reclaimed bricks. The idea behind them is that they will protect the fence that has yet to be re-erected between the ASH site and Multipackaging site. These gabion baskets will prevent the fence from being knocked by vehicles and they will also act as a barrier to catch any windblown litter. They can be easily repaired or replaced should they be damaged.

Construction of a new building had begun at the far end of the site beyond where the current concreted area reaches. This is where the planned biomass boilers will be situated. These boilers will be used to burn clean waste wood. They will be regulated under a Part B installation permit. This permit has been applied for through Wrexham County Borough Council. Once the permit has been issued we will discuss how you intend to keep both permitted operations on site clearly segregated.

Issues

The only point of concern observed at the time of the inspection was the large numbers of seagulls present on site. The gulls present on site appeared to have a preference for resting on the roofs of the waste processing building and the neighbouring non ASH buildings (Multipackaging). It was noticed that the bird scaring device (bird of prey noises) was turned on but it was having little to no effect on the seagulls. In condition 3.4 of your permit you are required to take all appropriate measures to prevent or where that is not practicable, to minimise the presence of pests on the site. You therefore need to review the techniques you are using on site to scare away the birds to establish if there are further methods that can be used. Examples of methods could include using deterrents on the surrounding roofs to prevent the gulls roosting, use of other auditory systems to scare birds away or using a bird of prey etc. A mix of methods may be needed. Some of these methods may require you to liaise with your neighbours. The seagull issue was highlighted in the last inspection form and has been highlighted again. I will expect an update on this subject during the next site inspection at the latest.

Overall, the site was observed to be in a tidy and organised condition considering the scale of the improvement works taking place. I will be very interested to see the site once everything has been completed.

At the end of the RDF and fines project we will be looking at the results we have gained and if there is any feedback we think needs to be passed back to operators we shall do so at that point.

EPR Compliance Assessment Report

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Operator/Permit holder	Alan's Skip Hire (Wales) Ltd	Date	25/01/2017

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.

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.

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	X	Due to large numbers of birds observed during the inspection the methods for deterring birds on site needs to be reviewed. An update is expected during the next site inspection.	01/04/2017

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.