

Compliance Assessment Report CAR_NRW0039538

Permit being assessed: AB3997CD.

For: Oakenholt Household Waste Recycling Centre, held by Flintshire County Council

At: Chester Road, Oakenholt, Flint, Flintshire, CH6 5SF.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 09/03/2022 between 13:20 and 13:40.

Parts of permit assessed: Specified by permit

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Gabrielle Povey, Site Manager on 11/03/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	C3 Minor	3.1.3
C2 - General Management - Management system and operating procedures	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
B4	Ensure oil bunds are checked and emptied regularly to ensure their effectiveness. A larger bund is required for the drums of kitched oil/grease	15/04/2022
C2	Send the procedure for the frequency of TCM attendance on site	15/04/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was an unannounced site inspection by Kathryn Bradshaw Hazardous Waste Regulation Officer on 09/02/2022. The weather was dry but windy. I was accompanied around the site by Kevin Challinor, site operative and John Evans, Chargehand for the site.

The site, on arrival was well maintained with good security and clear road markings. It is a two tiered site with cars unloading on the top tier and skips removed from the bottom tier.

All the containers and skips had correct signage indicating what materials could be deposited.

There were some items of litter at the rear of the yard behind the oils storage area. The staff advised me they try and clear up throughout the day if it is not too busy, but at the end of every day they go around the site and clear any litter that may have blown from the skips.

Litter at the rear of oils storage area



The carpet skip was full and awaiting collection. Mattresses were stored in a sealed container to protect them from the weather. Numerous TV's were stored outside the weatherproof container, the staff onsite explained they move them into the container throughout the day. Please ensure that they are moved into the container regularly.

TV's stored outside the container



The bund used for storing oil was full and an amount of oil was on the floor. I was advised this would be emptied when the tanker came to collect the waste oil and a collection had been booked.

Full bund with oil spillage on the floor



The bund that was used for other oils including kitchen oil and grease was not fit for purpose. There was a plank of wood laid over the top and came past the bund so any leaks or spills would go on the floor. One of the full drums was stored on the ground next to the bund. A larger bund is required for the storage of these items.

Bund too small for items being stored



I requested to view consignment notes and the site diary. I was told that all the consignment notes and waste transfer notes were kept in the office in Alltami. I viewed the site diary which detailed who was working on site and if there had been any incidents. It did not detail when the TCM was on site, instead I was shown a visitor logbook which showed the last time a TCM, Eryl House, was on site was 27/01/2022.

The following non compliances were found during the site inspection:

Permit condition 3.1.3 requires that:

All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other

appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

One oil bund was full and another bund was too small and not fit for purpose.

Action 1.

Ensure oil bunds are checked and emptied regularly to ensure their effectiveness. Install a larger bund for the drums of kitchen oil/grease.

Action 2.

Send a copy of your management system/procedure for the frequency of attendance on site for the TCM.

Thank you for your time during my visit. If you have any questions then please do not hesitate to contact me.

Kind Regards,

Kathryn Bradshaw

Swyddog Rheoleiddio Gwastraff Peryglus (GD)/ Hazardous Waste Regulation Officer (NE)

Cyfoeth Naturiol Cymru/ Natural Resources Wales

Ffôn/ Phone: 03000 65 5191

Ffordd Caer, Bwcle. Sir Fflint. CH7 3AJ / 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.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.