

Compliance Assessment Report CAR_NRW0038332

Permit being assessed: TB3397TD.

For: GTR Aggregates and Recycling Limited, held by GTR Aggregates & Recycling Ltd
At: Waste Transfer Station, Dee Bank Industrial Estate, Boot End, Bagillt, Flintshire, CH6 6HJ.

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

On 19/05/2021 between 14:00 and 14:50.

Parts of permit assessed: 'Storage, Handling & Segregation'

NRW Lead Officer: Sarah Walton.

Report sent to: Ben Entwistle, Operations Manager on 01/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	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
0	0

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
C4	Empty middle bay in waste transfer building to act as a fire break. Reduce volumes of waste being stored in the bays to 2.5m height. Reduce volume of waste being stored in Recycling Building (If not being emptied completely).	18/06/2021

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

On Wednesday 19th May 2021, Waste Regulation Officer, Sarah Walton conducted a pre-announced inspection along with colleagues from North Wales Fire and Rescue Service (NWFRS). Mr Upton and Ms Bouckley from NWFRS accompanied Sarah Walton to help assess fire risk on site, following concerns about the volume of waste being stored on site.

Officers met with Ben Entwistle on site who accompanied them throughout. The visit began with a discussion about site operations and the areas that were giving cause for concern.

Ben guided officers around site. The first area that was checked was the Transfer building which contains Household, Commercial and Industrial waste. It was noted that skip bays had now been constructed and the waste had now all been moved into the transfer building as stipulated by the permit. The sprinkler system was also now in operation.



The picture above shows storage of waste within the transfer building at the time of the visit (19/5/21). The waste was now mostly being stored within the boundary of the transfer building which was good to see. However, Mr Upton noted that the volume of waste being stored here and the fact it was piled high above the dividers, was a cause for concern and posed a high fire risk.

It was recommended that the middle bay could be emptied to provide a fire break until the waste can be managed at suitable levels stipulated in the site's EMS (2.5m). At present it is effectively one continuous pile of waste approximately 35 - 40m in length, 5m wide and 3m high. Should this catch fire, it is likely the fire would spread throughout the building very quickly. However, with the middle bay free, this should help reduce damage and pollution should the waste catch fire.

Officers continued to walk to the far right hand corner of the site. There remained a small pile of wood waste which was being cleared at the time of our visit and was in the process of being removed to another regulated waste facility. It was expected to be cleared by the end of the day.



Adjacent to this was the Recycling building which houses items such as cardboard and plastics. The pictures above show the storage of cardboard and plastics within the Recycling building at the time of the visit (19/5/21).

Mr Upton mentioned this area posed the most significant fire risk on site due to the volume and storage of waste. At this point Ben mentioned that the intention was to bale the remaining plastics and cardboard in the building for onward recovery but would like confirmation about whether baling was a permitted activity on site. Officers are continuing to liaise with Ben on this matter. Once the waste is cleared, Ben noted the plan was to demolish this building to make way for a new washing facility. Please bear in mind any significant changes like new treatments on site should be communicated to NRW and may require a permit variation.

As officers completed inspecting the waste storage buildings, Ben mentioned continuing issues with standing water on site. This is apparently because of difficulties with the landlord restricting access to the 'pump house' which is located off site. When the pump is turned off, this means site run off cannot drain as it should.

Officers were not aware of a pump house being connected to the site's drainage and are continuing to work with site to address this issue.

The visit concluded on site at approximately 14:45.

Thank you for your time and cooperation throughout the inspection.

Best wishes,

Sarah Walton
Waste Regulation Officer
03000 654 791

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.