

Compliance Assessment Report CAR_NRW0039633

Permit being assessed: NP3395EQ.

For: Brymbo Household Waste Recycling Centre, held by F C C Recycling (U K) Limited

At: Off Solvay Road, Wrexham Road, Wrexham, Clwyd, LL11 5NR.

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

On 18/03/2022 between 10:25 and 10:54.

Parts of permit assessed: waste returns, site security, reporting and notification to NRW, management system and operating procedures, Storage, handling labelling and Segregation

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Amy Henderson.

Report sent to: Thomas Bellis, assistant operations manager on 07/04/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
D1 - Incident Management - Site security	Assessed (A)	

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
G2	Please ensure TCMs attendance is recorded in the site's diary	11/04/2022
C4	As per schedule WEEE 2 directive requirements, WEEE directive Annex III, the WEEE should be stored on an impermeable surface with sealed drainage and also have weatherproof covering. Action: Please ensure that all WEEE is stored appropriately. Should there be no appropriate storage available, the site should refuse to accept such waste.	15/04/2022

Criteria	Action needed	Complete by
C4	: Please ensure that a larger container for gases in pressurised containers is provided on site. Please ensure that the gas container is emptied frequently and no canisters are stacked on top of one another.	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

On Friday the 18th of March 2022 waste regulation officers Boguslawa Pierzchala and Amy Henderson visited the site. The weather conditions on the day of inspection were clear and dry.

The officers spoke to the site supervisor, Mr Jones, who asked us to sign in. The site diary was inspected. Records in the diary gave details of who was on site, what type of waste was removed and when, and details of any accidents. It was noted that TCM's attendance was not recorded in the diary.

Action: Please ensure TCMs attendance is recorded in the site's diary. For **immediate** action.

Mr Jones phoned George Newman and Thomas Bellis, assistant operation managers, who agreed to attend and meet officers. Mr Jones then accompanied us during the inspection.

The site was operating and accepting waste from the public with several site attendants working.

The site is well labelled and signed to assist the correct disposal of waste.

Officers witnessed the "meet and greet" procedure. Members of the public are asked what waste they would like to dispose of. This procedure minimises unauthorised disposals but also has other advantages such as minimising some pollution risks, such as oil spillage, as some members of the public might find it difficult to decant oil into the tank. By implementing the "meet and greet" procedure the site operative can offer assistance.

The site does not accept gases in pressurised containers containing dangerous substances (EWC code 160504).

There were a few such containers on site having been left there by members of the public.

These item must be stored securely. At the time of the visit the containers were stored on top of each other in a locked cage, with one container stored outside. This was been brought to the attention of the site supervisor and TCMs and it was agreed that a larger container will be made available to ensure they are stored appropriately.



Action: Please ensure that a larger container is provided on site. Please ensure that the gas container is emptied frequently and no canisters are stacked on top of one another. Please comply by the **15th of April 2022**.

The site was well-organised and mostly clear of litter. Officers noticed soil on the ground outside the skip. This happens when members of the public tip the soil on the incorrect side of the skip. The soil is cleared on a regular basis. Please make sure the soil is cleared at the end of each day.

Officers noticed several fridges stored outside. This was discussed with the site supervisor who explained that they were awaiting collection.



As per schedule WEEE 2 directive requirements, WEEE directive Annex III, the WEEE should be stored on an impermeable surface with sealed drainage and also have weatherproof covering.

Action: Please ensure that all WEEE is stored appropriately. Should there be no appropriate storage available, the site should refuse to accept such waste.

Recycle skips and containers were well maintained with no clear visible damage. It was also clearly indicated what materials could be disposed in them. The walkways were also clear of any materials and no hazards were noted. The lower section of the site (no access to the public) was clear with easy access to all

containers and skips.

Thank you for your time during the inspection, please find my contact details below.

Kind Regards

Boguslaw Pierzchala

Waste and Environment Officer (NE Waste Regulation Team)

Email: boguslaw.pierzchala@naturalresourceswales.gov.uk

Post: Natural Resources Wales, 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.