



Transform Recycling Limited
Unit 5
Viaduct Road
Gwaelod-Y-Garth
Cardiff
CF15 9JN

Our ref: SEA/EM2/AC040928

Your ref:

Date: 4th September 2014

Dear Mr. Hughes,

Transform Recycling – Site Improvement Plan 4th September 2014

During recent weeks we have received a number of complaints from members of the public regarding dust leaving site and causing serious health implications. The resulting inspections confirmed that dust leaving site was causing a nuisance and therefore breaches were scored against the site's Environmental Permit.

Natural Resources Wales is able take enforcement action where you have not complied with your permit but if we are satisfied that:

1. you are taking acceptable and timely action to correct the non-compliance; or
2. you are again complying with your permit;

Then we will not continue to record the non-compliance on our Compliance Classification Scheme (CCS) for charging purposes.

We would like to give you the opportunity to propose how this issue will be rectified and compliance re-established. The template below allows you to set out your actions and timetables for the Natural Resources Wales to consider.

In the mean time we will continue to record non-compliance on our CCS database.

Completion dates should not exceed 6 months of the date of this letter. We will assess your proposed timescales to ensure they are achievable.

Permit Number:		Operator name:
Permit condition not complied with.	Action you proposed to take outlining important milestones and dates.	Completion dates.
1.1.1	Attend relevant WAMITAB courses and achieve required level of Technical Competence	1 st January 2015
3.1.1	Move shredder to rear of building and shred material regularly so as to avoid a backlog	Immediately
3.1.1	Sourcing a secondary shredder with integrated dust suppression to process "dirty" wood, whilst using original shredder for "clean" wood.	2 nd October 2014

3.1.1	Create a bund of existing woodchip between shredder and neighbouring property to the East in the interim period while further fencing work is carried out	Immediately
3.1.1	Raise fencing on Eastern side of the yard by an additional 3 metres with fine netting to reduce dust leaving site.	2 nd October 2014
3.1.2	Submit to NRW an Emission Management Plan which identifies and minimises the risk of pollution from dust.	25 th September 2014
1.1.1	Submit to NRW a full and relevant Environment Management System detailing site operations and appropriate risk assessments in line with Horizontal Guidance Note H6 – Environmental Management Systems (included)	1 st January 2015

Operator/Permit holders signature.....

Print your name here:.....

The information you provide us with needs to be **very** clear and unambiguous. The actions you plan to undertake need to be specific enough for us to be able to judge whether they will bring your site back into compliance and that they have been completed.

The dates for completion of the works need to be clear. If the final deadline is some months ahead, you should identify some intermediate dates for important milestone actions.

We shall assess whether you have met these intermediate deadlines. If you do not meet them we will consider appropriate action and re-activate the non-compliance records for the conditions stated above. This may increase your annual subsistence fee paid.

You must ensure that there is no unacceptable environmental impact during the period of the non-compliance. The aim of Natural Resources Wales is to protect the environment and we will not agree to continued environmental pollution.

Following receipt of your proposals we will contact you to let you know whether, on the basis of your action plan, we will suspend further non-compliance records for those conditions for a specified period.

The benefits of this approach would be:

- You have the chance to remedy a non-compliant situation that we consider may be difficult to sort out immediately, without being further penalised;
- You are encouraged to deliver improvements and are not penalised financially for in progress non-compliance whilst you demonstrate that you are taking all reasonable measures to bring the activities back into compliance within an agreed timescale. **Note:** We will still record non-compliance relating to this matter, but they will not count towards your overall compliance rating (and therefore next year's fees) if the work you are undertaking progresses in accordance with the defined timeframe and brings your site back into compliance and;
- There is assurance that the environment is being protected.

If you have any queries regarding this letter, the CAR forms or suspending CCS scores, please do not hesitate to contact me on the details below.

Yours sincerely,

Alex Carter
Environment Officer
Natural Resources Wales
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Direct e-mail alexander.carter@naturalresourceswales.gov.uk