

This form will report compliance with your permit as determined by an NRW officer

Site	Roydon Bottle Recycling Ltd	Permit Ref	PB3393HD		
Operator/Permit holder	Roydon Bottle Recycling Ltd				
Regime	Waste Operations				
Date of assessment	22/03/2017	Time in	11:00	Out	11:45
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by	Perry, James				
Recipient's name/position	Janet Rawlings/ Manager	Date issued	04/04/2017		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	C3	Table S1.2
B5 - Infrastructure - Plant and equipment	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	
F3 - Amenity - Dust/fibres/particulates and litter	C3	3.4
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	2	Total compliance score (see section 5 for scoring scheme)	8
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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

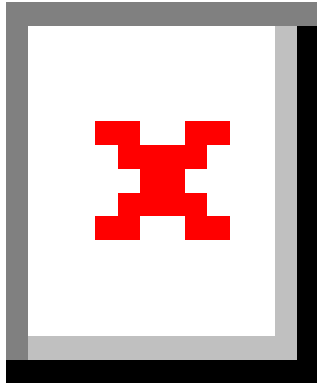
This section contains a report of our findings and will usually include information on:

- 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

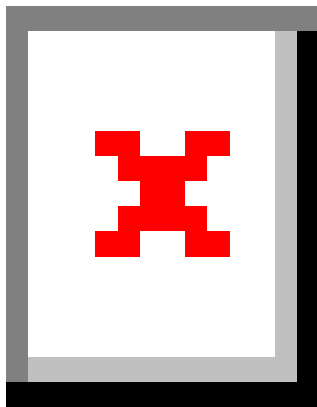
Officers Alex Bowder and James Perry attended on Wednesday 22nd March at 11:00 to conduct a routine site inspection of Roydon Botte Recycling Ltd - Permit number: **EPR-PB3393**. We were accompanied around the yard by site worker Mr. John Wait. The weather was mild and dry at the time of visit.

<p><u>Breach – Category 3</u></p> <p>B4 – Infrastructure Condition 2.3 - Table S1.2</p> <p>Containment of stored materials</p>	<p>The business stated that they did not have any shipments of skips in/out of the unit for a week due to the repair of the tarmac outside the shutter door.</p> <p>This resulted in a significant build-up of sludge material being stored inside the door. Because the de-watering screw was not operating to full capacity, this has resulted in the paper sludge retaining a higher water content than usual. Subsequently water is soaking out of material and pooling around machinery and walkways in the area.</p> <p>It seems that there is no contingency plan in place for when machinery stops working. A back-up plan should be created for all operations in the EMS document. Improvements must be made to operations to enhance containment procedures and prevent water soaking out of the material and pooling in the unit.</p>
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<p><u>Breach – Category 3</u></p> <p>F3 Amenity Dust/Fibres/Particulates and Litter</p>	<p>The accumulation of waste debris around the processing plant from the washing/shredding operations on-site has the potential to attract pests.</p> <p>More litter was witnessed in the yard than usual on this inspection. Please ensure all litter is captured in the daily clean ups. A breach has been scored on this instance as a result.</p>
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Picture 1 – showing water soaking out of waste paper sludge pile



Picture 2 – showing water pooling around machinery and walkways

Containment of the sludge matter in this part of the building must be looked at to avoid further occurrences. The business is now looking into obtaining a different machine to de-water the paper to minimise the water content. Although the water is reused in the washing process with acceptable pH levels, we deem it is not appropriate for it to be pooling in this volume. Please see that this excess water is cleaned up as soon as possible.

It was also mentioned that channels near the bag-fill area were in the process of being dug out to prevent water from pooling in this area. Please see that this is completed promptly and that no potentially contaminated leachate escapes the drainage system and leaves site.

The current WAMITAB qualification holders for the site are Phillip Hopkins and Janet Rawlings. Please can you send through the most current certificates to us so that they can be uploaded to your file; please be mindful to enrol on the refresher courses once they expire.

Drainage where clear of sediment at the time of visit. No issues apparent. Waste returns being correctly submitted every quarter.

If you have any issues with this report please contact Alex Bowder at alex.bowder@naturalresourceswales.gov.uk or on 0300 065 3394. Thank you.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0031435**

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Site	Roydon Bottle Recycling Ltd	Permit Ref	PB3393HD
Operator/Permit holder	Roydon Bottle Recycling Ltd	Date	22/03/2017

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.

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			
F3	C3	Ensure all waste is collected on pick-ups	04/05/2017
B4	C3	Improve infrastructure and operations	04/05/2017

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.