

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

| | | | | | |
|--|--|---------------|-----------------|--------------|------------------|
| Site | Materials Recovery and Energy Centre | Permit Ref | BJ5775IF | | |
| Operator / Permit Holder | Neath Port Talbot (Recycling) Limited | | | | |
| Date | 13 May 2015 | Time in | 10:00 | Out | 13:15 |
| What parts of the permit were assessed | See Section 1 | | | | |
| Assessment | Audit | EPR Activity: | Installation: X | Waste Op: | Water Discharge: |
| Recipient's name/position | Kevin Stewart. Health & Safety Manager | | | | |
| Officer's name | Guy Baskerville / Karen Dunn | | Date issued | 15 July 2015 | |

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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 | | | Condition(s) breached |
|---|--|----|-----------------------|
| a) Permitted activities | 1. Specified by permit | A | |
| b) Infrastructure | 1. Engineering for prevention & control of pollution | N | |
| | 2. Closure & decommissioning | NA | |
| | 3. Site drainage engineering (clean & foul) | N | |
| | 4. Containment of stored materials | A | |
| | 5. Plant and equipment | N | |
| c) General management | 1. Staff competency/ training | N | |
| | 2. Management system & operating procedures | N | |
| | 3. Materials acceptance | N | |
| | 4. Storage handling, labelling, segregation | N | |
| d) Incident management | 1. Site security | N | |
| | 2. Accident, emergency & incident planning | N | |
| e) Emissions | 1. Air | N | |
| | 2. Land & Groundwater | N | |
| | 3. Surface water | N | |
| | 4. Sewer | N | |
| | 5. Waste | N | |
| f) Amenity | 1. Odour | N | |
| | 2. Noise | N | |
| | 3. Dust/fibres/particulates | N | |
| | 4. Pests, birds & scavengers | N | |
| | 5. Deposits on road | N | |
| g) Monitoring and records, maintenance and reporting | 1. Monitoring of emissions & environment | N | |
| | 2. Records of activity, site diary, journal & events | N | |
| | 3. Maintenance records | A | |
| | 4. Reporting & notification | N | |
| h) Resource efficiency | 1. Efficient use of raw materials | N | |
| | 2. Energy | N | |

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

| | | | |
|------------------------------------|---|---|---|
| Number of breaches recorded | 0 | Total compliance score (see section 5 for scoring scheme) | 0 |
|------------------------------------|---|---|---|

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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

Introductions

Persons Present:

- Guy Baskerville. PPC Officer. Natural Resources Wales.
- Karen Dunn. PPC Officer. Natural Resources Wales.
- Kevin Stewart. HSE Manager. Neath Port Talbot (Recycling) Limited.
- Chris Roberts. General Manager. Neath Port Talbot (Recycling) Limited.

Scope

The permitted operation is a High Public Interest (HPI) installation due to historic and ongoing complaints in relation to malodours alleged to have been caused by the operation. The number and frequency of complaints has reduced significantly in the last year and at the time of the audit there had been only 3 complaints in 2015.

Trend data for complaint frequency reveals that the greatest number of complaints are received during the warmer summer months when the microbial activity which breaks down biodegradable wastes and produces odour is at its highest. The purpose of the audit was to review the maintenance regime associated with the odour abatement infrastructure employed at the installation in advance of the warmer months.

Between 09:40 and 09:55 on the morning prior to the audit Guy Baskerville and Karen Dunn walked along the length of Elba Crescent. The houses on Elba Crescent are the closest residential premises to the operation and the source of a number of complaints regarding malodours. No discernible odour was detected.

The Audit

Review maintenance records for odour abatement infrastructure

Reception Hall

Odour Rotary Atomisers

Monthly maintenance checks undertaken by supplier (Probe Industries).
Records of maintenance checks are retained by Ian Rees (site engineer).
Records of maintenance checks were reviewed during the audit and found to be complete and in order.

Fast Acting Doors/Air curtain

Quarterly maintenance checks and servicing undertaken by operator.
Records of maintenance checks (document ref. NPT 97) are retained by Ian Rees.
Records of maintenance checks were reviewed during the audit and found to be complete and in order.

Louvres (activated carbon filters)

All four louvre carbon filters were replaced in January 2015 but no records could be provided by the operator.

Carbon filters are due to be replaced again in July 2015 (bi-annual replacement cycle as recommended by supplier) and records of the replacement are to be retained

Spare carbon filters are retained on-site.

Monthly maintenance checks undertaken by the operator.

Records of maintenance checks (document ref. NPT 96) are retained by Ian Rees.

Records of maintenance checks were reviewed during the audit and found to be complete and in order.

De-duster

It is recognised by the operator that the de-duster is in need of replacement and quotes have been obtained. The planned replacement is on hold awaiting the outcome of a board level decision regarding the future business strategy.

Monthly maintenance checks are undertaken by the operator. Records of maintenance checks (document ref. NPT 56/800) are retained by Ian Rees.

Records of maintenance checks were reviewed during the audit and found to be complete and in order. Completed copies of maintenance checks for Jan – April 2015 provided via email on 14 May 2015 (see figure 1).

Those actions identified in the monthly checks are recorded in the maintenance diary at the end of the shift in which the checks are carried out. Workforce engineers review the diary at the beginning of each shift and prioritise actions accordingly. A number of actions identified in the recent monthly checks are outstanding, awaiting the outcome of the board level decision regarding the future business model of the operation.

We expressed concern that the informal method of recording actions may result in a failure to close out those actions.

Action: Operator to consider formalising the recording of maintenance checks and capturing of identified actions in the new electronic management system provided by Thomas Carroll Group PLC (discussed later).

General Comments

During our tour of the reception hall very little pre-treated (black-bag) waste was observed. The operator explained that this was owing to the reliability and speed of the new shredder. The old shredder is retained onsite as a back-up and is started up occasionally to ensure it is still operational.

A door along the reception hall walk way was observed ajar. This has been observed during previous audits and the operator needs to impress upon its work-force the importance of keeping all pathways for the escape of odour closed.

The venting of the de-duster appeared in a state of general disrepair and a number of grates were missing.

Action: Operator to repair/replace de-duster venting and grates.

UPDATE: On 14 July 2015 Kevin Stewart informed the regulator that the program to repair/replace the de-duster venting and grates had begun (see photograph 1).



Photograph 1

MARCH 15

| NPT RECEPTION LTD. | | FORMS | Instruction N°: NPT 56 Page: 1 of 1 ISSUE DATE: 15.08.2012 ISSUE N°: 01 |
|---|------------------------------|-------|--|
| Reception | MONTHLY DE-DUSTER CHECKSHEET | | 800 |
| Task | Completed | | |
| Check North Road Tank & Drain Down Tank | ✓ | | |
| Clean Site Glass & Pressure Connection Pipe | ✓ | | |
| Clean & Check Condition of PH Probes | ✓ | | |
| Clean & Check Condition Eliminator Plates | X | | |
| Clean & Check Condition of Swirl Baffles | ✓ | | |
| Clean Top Chamber & Drain Channel | X | | |
| Clean & Check Condition of Walls In Bottom Chamber | ✓ | | |
| Clean & Check Condition of Paper Traps | ✓ | | |
| Check Condition & Replace Hatch Door Gasket Seals & Bolts | ✓ | | |
| Empty & Clean Waste Bins | ✓ | | |
| Check Chemical Drum Levels & Refill as Required | ✓ | | |
| Refill Tank, Check Levels & Leakage On Hatches | ✓ | | |
| Additional Work/Notes | | | |
| ELIMINATOR PLATES + SWIRL BAFFLES CORRODED + HOLD | | | |
| SWIRL BAFFLES CORRODED + SECTIONS MISSING | | | |
| SITE GLASS + FRAME CORRODED | | | |
| PRESSURE VESSEL + PUMPING CORRODED | | | |
| ACIO + SOLENOID IN LINES/PUMPS CORRODED | | | |
| GREEN WASTE WASHED OUT | | | |
| INTERNAL WALLS PAINTED | | | |
| PAINT AREA CORRODED | | | |

Figure 1

Breaks in the building cladding between the reception hall and the process hall had been re-clad following the removal of transitional conveyors (work completed end of 2014).

Process Hall

Deduster

Monthly maintenance checks are undertaken by the operator.

Records of maintenance checks (document ref. NPT 56/801) are retained by Ian Rees.

Records of maintenance checks were reviewed during the audit and found to be complete and in order.

Completed copies of maintenance checks for Jan – April 2015 provided via email on 14 May 2015.

Bio-filter

The assessment of the bio-filter odour control unit undertaken by Odour Services International Limited (OSIL) in October 2013 identified odour abatement efficiencies of 73.7% and estimates that the remaining media life is up to 3 years. The media is due to be replaced and upgraded in September 2015 and will result in a 1 week downtime of operations. The operator committed to cleaning the ducting and aeration pipework of the bio-filter upon replacement of the media. The electronic control system for the bio-filter will also be upgraded upon replacement of the media.

UPDATE: On 9 July 2015 Kevin Stewart informed the regulator that the replacement of the bio-filter media is on hold awaiting the outcome of a board level decision regarding the future business strategy. The planned upgrade to the electronic control system is still being progressed.

Daily bio-filter maintenance checks were reviewed during a compliance audit carried out by Natural Resources Wales on 15 July 2014. The auditor observed gaps in the checklist where key personnel were absent. An action was recorded requiring the operator to ensure that maintenance checks are carried out daily and in line with agreed maintenance procedures.

Monthly maintenance checks undertaken by the operator.

Records of maintenance checks are retained by Ian Rees.

Records of maintenance checks were reviewed during the audit and found to be complete and in order

General Comments

The operator explained that all the integral plant in the process hall is cleaned each weekend. Written cleaning procedures and risk assessments are in place for each piece of equipment and issues and actions are recorded in the maintenance diary.

The cleaning procedure and risk assessment for cleaning the shredder (document ref NPT 452) was reviewed during the audit.

We expressed concern that the informal method of recording actions may result in a failure to close out those actions.

Action: Operator to consider formalising the recording the issues and actions identified during process hall cleaning procedures in the new electronic management system provided by Thomas Carroll Group PLC (discussed later)

The trommel from the process hall had been removed at the time of the audit and installation of the replacement was due to begin the following week.

At the time of the audit the roof cables and ducting were being cleaned using cherry pickers.

The operator explained that the process hall shredder has an integral fire suppression system installed as per the requirements of the insurers.

2 doors on the northern side of the process hall have been replaced. Further door replacement is planned in other areas of the main building.

The external door to the historic "Green Shred" room was open as engineers were working on the electrics. A sweet odour was detected in the locality but was not detectable beyond the doorway.

Fuel Preparation

General Comments

We observed a significant quantity of pre and post shred waste being stored with the fuel preparation hall. The operator explained that this was caused by the hold ups associated with transferring baled RDF offsite. Unbaled SRF is being transferred offsite where possible to relieve the build-up of waste.

The de-duster to the rear of the fuel preparation hall had been ducted into the building but due to condensation build-up and following direction from the Health & Safety Executive the de-duster now vents to atmosphere. The proposed permit variation application (discussed below) will seek to regularise this activity.

A new fire door has been installed to the rear of the fuel preparation hall.

A new electronic thermal monitoring system to detect heat build-up within the stockpiles of shredded waste was installed in December 2014.

Recycling Building

Fast Acting Doors

Quarterly maintenance checks and servicing undertaken by operator.
Records of maintenance checks (document ref. NPT 97) are retained by Ian Rees.
Records of maintenance checks were reviewed during the audit and found to be complete and in order.

General Comments

The operator explained that all food waste received at the recycling building is removed by 5 pm each day and no food waste is stored over-night. Food waste storage bays are also washed daily.

The operator explained that the storage of green waste will be moved to the reception hall following the proposed permit variation and upon completion of the programme to upgrade the council refuse collection vehicle fleet.

Conclusion

The operator was able to provide good evidence that maintenance checks for odour abatement infrastructure takes place as per their written maintenance procedures. This evidence was mostly in the form of handwritten checklists retained as hard copies and/or entries in the maintenance diary. We have concerns that the capturing and closing out of actions is too reliant on these handwritten notes and may result in actions being lost or not addressed. We are encouraged by the proposed implementation of the electronic management system (discussed later) and recommend that the capturing and closing out of actions is managed by this system upon roll-out.

Proposed permit variation

On 26 March 2015 Neath Port Talbot (Recycling) Limited submitted to Natural Resources Wales a summary of proposed operational changes to be formalised in a planned permit variation. An updated version of the proposal was provided during the audit and the key points discussed. We invite the operator to take part in formal pre-application discussions regarding the proposed variation application if they have any further questions.

Storage of RDF at a dockside

Since June 2013 Neath Port Talbot (Recycling) Limited has transferred over 22,000 tonnes of RDF to the dockside facility at Swansea docks operated by Environmental Practical Solutions Limited (EPS). In recent months overseas clients have reported a reduction in the caloric value provided by the RDF below the agreed CAR 2 V1.0

specification and are no longer accepting RDF from the installation. It is alleged that the reduction in calorific value is a result of excessive storage periods at the dockside facility and Neath Port Talbot Recycling Limited will no longer be shipping RDF via the dockside facility at Swansea docks.

As a result of the above, 2000 tonnes of RDF is currently being stored at a number of locations across the permitted area contrary to condition 2.1.1 (by virtue of table S1.1 of schedule 1) of the environmental permit.

Condition 2.1.1 states that;

The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

In respect to the storage of RDF, Table S1.1 states that;

No more than 400 tonnes to be stored on flat floor with push walls in Area 1.12.



Photograph 3 & 4 – Storage of RDF in tonnages and storage locations contrary to that specified in the environmental permit.

Overseas export and national transfer options are being considered and contract tender(s) are being prepared. Chris Roberts has recommended to the board that the tender be broken down amongst multiple contracts to provide future resilience in the event of an outlet being unexpectedly removed.

The following fire prevention/management arrangements are in place.

- Network of 64 video and thermal cameras installed at key observation areas across the site. The cameras are monitored by a third party in Swansea and Kevin Stewart has access to a live feed in his office. The feed is recorded in cycles of 31 days.
- Baled RDF storage areas are checked every 2 hours.
- Baled RDF stored at least 10 metres from any building (as per the requirements of the insurance company).
- GreCon fire suppression systems installed on all non-intrinsically safe equipment.
- Automatic cut-off valve of surface water drainage network (including manual over-ride).

UPDATE: On 5 June 2015 Guy Baskerville and Paul Gibson (NRW Industry Regulation Team Leader) visited the installation to discuss temporary arrangements for the storage of additional baled RDF pending the securing of new waste recovery outlets.

During the meeting we agreed the following temporary proposals:

1. Additional baled refuse derived fuel material can be stored external to the main building.
2. All bales shall be wrapped to the current standard (10 wraps).
3. Baled wastes shall be tracked to monitor age of bale and storage duration. Oldest bales shall be removed as a priority.
4. Bales shall be routinely inspected and repaired promptly if damaged. Inspections and repair shall be documented.
5. Bales shall be inspected for pest damage and infestation and odour on a frequent basis. Inspections and

- any remedial action shall be documented.
6. No baled waste shall be stored beyond the office / amenity building.
 7. No more than 6,000 tonnes of baled waste be stored at any one time.
 8. Baled waste shall return to permitted levels by 31 August 2015.
 9. Regular updates (at least every fortnight) on waste levels and recovery outlets shall be provided to Guy Baskerville (or other nominated officer).

This agreement is subject to the following conditions:

1. In the event of substantiated amenity complaints of noise, odour, pests and vermin as a result of external bale storage, Neath Port Talbot (Recycling) Ltd will promptly arrange for remove baled waste from site on direction by Natural Resources Wales.
2. The three month additional storage is based on a worst case scenario. We would expect levels of material being stored externally to reduce during August.

UPDATE: Natural Resources Wales has taken receipt of fortnightly updates since the above proposals were agreed.

AOB

Electronic Management System

Neath Port Talbot (Recycling) Limited will be introducing a new electronic management system in June 2015 provided by Thomas Carroll Group PLC. The new system collates all relevant management procedures into a single interface and provides alerts when action is required. Whilst geared towards health and safety procedures, the intention is to incorporate those procedures associated with environmental permit compliance.

Current procedures are being reviewed pending upload to the new electronic management system.

We request a demonstration of the new system during our next visit.

END

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

| | | | |
|------------------|---------------------------------------|--------|--------------|
| Site | Materials Recovery and Energy Centre | Permit | BJ5775IF |
| Operator/ Permit | Neath Port Talbot (Recycling) Limited | Date | 15 July 2015 |

Section 3- Enforcement Response **Only one of the boxes below should be ticked**

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

| Criteria Ref. | CCS Category | Action Required/Advised | Due Date |
|---------------------|--------------|-------------------------|----------|
| See Section 1 above | | | |
| | | | |
| | | | |

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 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 which 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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

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

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 twenty 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 the officer's line managers. 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) 601 0987**.