

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) Ltd						
Date	10 October 2013			Time in	10:00	Out	13:45
What parts of the permit were assessed	See Below						
Assessment	Choose an item.	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Kevin Stewart / Health and Safety						
Officer's name	Karen Dunn			Date issued		30 October 2013	

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	3	2.1.1
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	3	2.3.1
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	3	1.1.1
	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	3	3.3.1
	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	3	1.1.2
	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	5	Total compliance score (see section 5 for scoring scheme)	20
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (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:

Neath Port Talbot (Recycling) Ltd (NPT) representatives present during this audit were:

Kevin Stewart (KS) – Health and Safety Manager
Karl Rogers (KR) – Shift Team Leader

This was a pre-arranged audit which included a visit from Natural Resources Wales waste advisor Gareth Lewis. The audit covered the following topics:

- The findings of an odour complaint investigation that morning;
- Changes in personnel since the last Compliance Assessment Report (CAR) form;
- Waste to Energy (WTE) – Including a review of the emissions and monitoring permit requirements;
- Actions placed on the last CAR (Ref: 5225);
- Complaints data;
- Odour Management – Odour action plan and Odour Management Plan (OMP)
- Site Visit – Including an overview for Gareth Lewis

Incident Response 10 October 2013

Just before this audit a complaint of a 'rubbish' odour was received by Natural Resources Wales (NRW) from a member of the public resident at Elba Crescent Crymlyn Burrows, Swansea. The inspecting officer accompanied by NRW waste advisor Gareth Lewis investigated the report prior to visiting the Materials Energy and Recycling Centre (MREC).

The location of the report was attended at 09:40. On exiting the vehicle at the eastern end of Elba Crescent no odour was evident. There was a moderate north westerly wind which was stronger at the eastern end of the crescent due to a break in the tree line along the northern boundary. The NRW staff walked Elba Crescent and approximately half way along a distinct 'window' of odour was present. The smell was a 'mildly offensive' (Common Incident Classification Scheme (CICS) guidance for assessing impact from odour for Category 3) waste type smell reminiscent of the MREC and present at the houses located in the middle of Elba Crescent. This incident was therefore substantiated by NRW and classed as a Category 3 incident according to CICS. On leaving Elba Crescent the officers attended the MREC the findings of which have been detailed below.

Changes in personnel since the last CAR (Ref: 5225):

In August Gareth Bugler the Waste to Energy (WTE) co-ordinator left Neath Port Talbot Recycling Ltd (NPT). NPT was undergoing a staff re-structure at the time of the audit following their decision to mothball the WTE section of the site (See Below).

Waste to Energy

NRW was formally notified in a letter dated 27 September 2013 of the operator's decision to 'mothball' the WTE plant until further notice. KD enquired during this audit over the operator's proposal to inform the local community of this decision. NPT intends to inform the community at the next Liaison Committee Meeting on 6 November 2013 following completion of the staff re-structure.

- Emissions and Monitoring

It was agreed with the operator that a review of the monitoring and reporting permit requirements would take place during this audit due to the current status of the WTE.

The tables outlined in Schedule 3 – Emissions and Monitoring were reviewed with the operator based on the following agreement made during this visit.

1. Operator will need to submit a nil return for those emissions not being tested for as a result of the current status of the WTE.
2. Data will need to be supplied where required for the periods the WTE was operation and a nil return should then follow.
3. Annual submissions are to be made to include the WTE data up until the point it was 'mothballed' following which a nil return should be submitted where applicable.

Table S3.1- Nil return to be submitted except for emission points A3 and A4 which remain unaffected.

Table S3.1(a) - Nil return to be submitted

Tables S3.2 through to S3.5 - Remain unaffected by the change and are still valid

Table S3.5 - Data will need to be supplied for the periods the WTE was operation and where applicable a nil return should then follow. The leachate emission point in this table is unaffected by the change.

Table S3.6 - Nil return to be submitted

Table S4.1 – Data to be submitted for the period the WTE was operational and annual submissions still apply namely water usage, Energy usage and waste disposal/recovery in this table.

Table S4.2 – Annual submissions to be made inclusive of the data for when the WTE was operational.

The agreement concerning the monitoring and reporting requirements in the permit will be subject to NRW review by 1 April 2014. This timeline is required as the status of the WTE plant directly impacts on the environmental permit and therefore a long term permit change may be required depending on the future operations at the site. Should the facility continue to operate without the incinerator it is considered that the facility will fall under Section 5.4 Disposal, recovery or a mix of disposal and recovery of non-hazardous waste Part A(1) (b) of the Environmental Permitting Regulations 2013.

Actions in the last CAR form (Ref: 5225)

Three actions relating to odour management were placed on the operator in the last CAR form with a deadline of 31 August 2013.

For ease of reference these actions have been replicated below:

1. Operator to provide an update on the proposed work to further reduce the potential for off-site odours following the NPT (Recycling) Ltd board meeting of 25 July 2013.
2. Operator to provide a timeline for the proposed change to the de-duster in the waste reception hall.
3. The operator is required to review the operation and maintenance of the bio-filter to maximise its efficiency and provide a report to NRW on the review by 31 August 2013.

The operator responded in writing to these actions on 29 August 2013. In brief NPT decided to seek advice from an odour control specialist (Odour Services International Ltd (OSIL)). The advice sought related to the number of air changes in the reception and process areas, the replacement of the de-duster in the waste reception hall with 2 caustic scrubbers and a review of the existing bio-filter. A request was made by KD for a copy of the scope of the work provided to the specialist. KS explained that a scope had not been provided and the specialists were verbally informed of the problems during a visit and were asked for advice.

During this audit KS provided a further update to this proposed work:

- A decision at the September 2013 NPT board meeting was made to go ahead with the scrubber

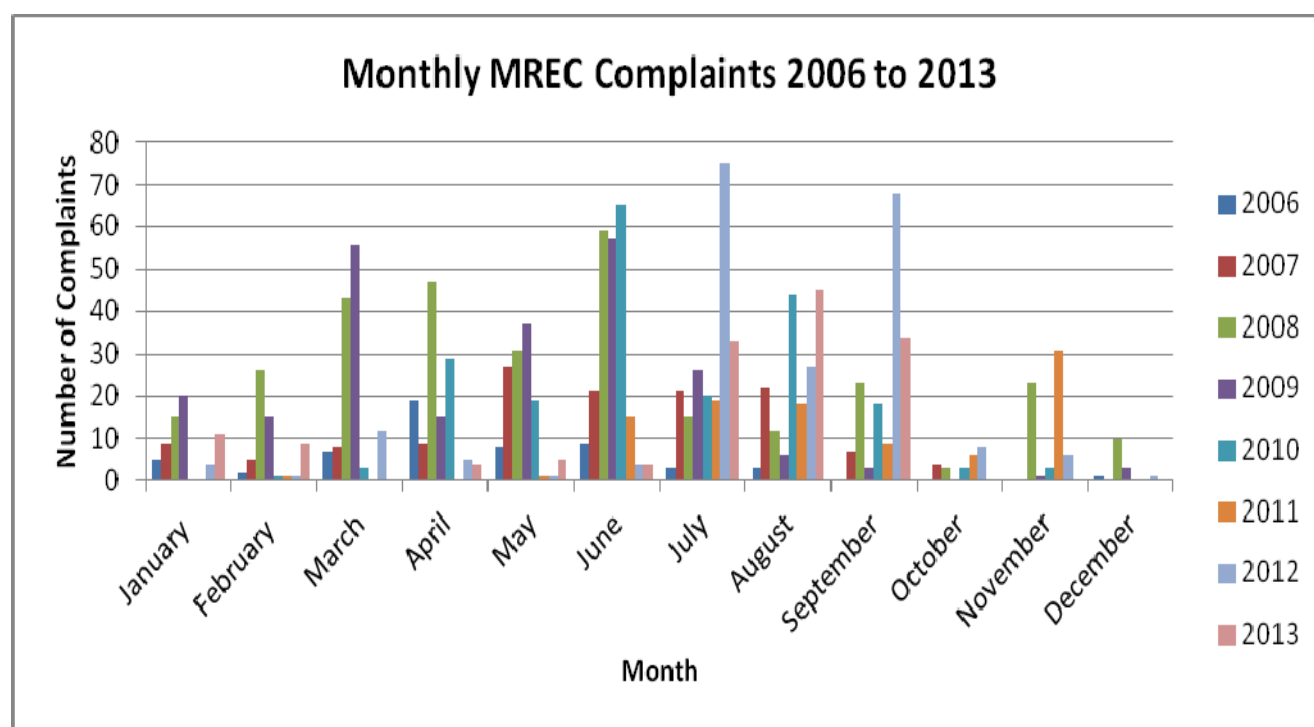
system proposal that will replace the existing de-duster. KS stated that the specialist contractor would be visiting site on Monday 14 October 2013 to discuss timescales for implementation. It is also proposed that the operator will put in place an external contract for the maintenance of the new system and arrange for an assessment after the change by an independent third party specialist e.g. Odournet.

- OSIL are in the process of compiling their report following a review of the bio-filter. A request was made by NPT in a letter dated 27 September 2013 for an extension to 31 October 2013 for the provision of this report to NRW. An agreement to the extension was given in this audit.

Recommendation: A change to the existing plant set up will require a variation to the environmental permit for the site. Furthermore a BAT assessment will be required to support the application for the change and modelling of any additional or changes to the emissions to air. It was advised during this audit that this work should be undertaken soon to prevent any delays to the change to the de-duster.

Complaints

The numbers of complaints in recent months have increased significantly from June 2013. The graph below shows the number of monthly complaints received by the regulator from 2006 to 2013. The graph was compiled to make comparisons in order to better understand the scale of the odour issue over the last few months.



From the graph the number of complaints in July and September of 2012 and 2013 were greater than in the last 5 years. This is of significant concern to NRW as odour from the plant has been detected off-site by the regulator and this situation needs to improve as a priority. Although it is recognised in Odour Management Guidance H4 that there are a number of reasons why complaints are received about a site the data is a useful source of information to help understand a problem. KD enquired if the operator trends the complaint data they receive and KS was able to show a similar graph which is shared regularly at board level.

Review of Odour Action Plan

In 2010/11 a number of improvements were made at the MREC which included sealing between the walls and the roof of the building, replacement of the bio-filter media, repairing damaged panels in the building etc. These improvements were made by the operator who implemented an odour action plan. A copy of the action plan was shared with the regulator to demonstrate the operator's approach to addressing the odour issue.

In 2011 the number of complaints received by the regulator dropped from 205 in 2010 to 100 and this may have been a result of the actions implemented in the operator's odour action plan. However in 2012 the complaint figures rose again to 212. An objective of this audit was to assess if those actions that were

undertaken in 2010/11 are still being maintained and implemented in line with the agreed operating techniques linked to the environmental permit.

This is considered to be a timely exercise due to the proposed changes to the de-duster unit in the waste reception hall. The audit should give the operator the opportunity to demonstrate that existing plant is being operated to its maximum efficiency so any proposed change will build on the improvements previously implemented.

The inspecting officer focused on the sections of the action plan that could be cross referenced with on site activity in particular those relating to the process building and bio-filter.

2010 Odour Action plan

- 1. Replace bio-filter media and ensure air distribution and humidification systems are operating effectively (Target completion November 2010)*

The operator demonstrated that the replacement of the bio-filter media took place on 17 January 2011. Environment Agency Wales (EAW) included improvement condition (IC) 9.48 to the environmental permit for the bio-filter, for ease of reference this has been replicated below. A report was submitted by the operator and accepted by EAW to meet the IC so it now forms the operating techniques for the site. This improvement condition also directly relates to the second point in the odour action plan below:

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
9.48	The operator shall replace the biofilter media and provide documentary evidence that the air distribution and humidification systems are operating effectively across the entire biofilter. The operator shall also provide details of the measures to be taken to ensure that the biofilter, air distribution and humidification systems will be monitored to ensure they remain fully operational and work as designed.	01 March 2011

- 2. Record and trend critical measurement parameters from the humidifier and bio-filter. Target Completion : Complete*

KS and KR explained that parameters on the bio-filter and humidifier are recorded on the sites control or WTT system. The Fuel Prep Team Leader takes a screen print from the WTT system on a daily basis. The trending of critical measurement parameters does not take place at the MREC. This was further explored with the Fuel Prep Team Leader during the site visit (Site Observations below).

- 3. Carry out ammonia monitoring study to determine whether acid scrubbing of the inlet would be advisable prior to the bio-filtration. Target Completion: December 2010*

This was also included as an improvement condition in the last permit variation. This improvement condition was met and has not been discussed on this CAR.

- 4. Repair damaged panels in walls in SE corner of processing building and the damaged door on the RDF building. Target Completion – Completed 2010*

KD enquired about a procedure for maintenance and repair to the building to ensure that any damage subsequent to 2010 is dealt with. The operator explained that the relevant team leader completes a shift log where any damage is noted and subsequently repaired as soon as possible. The operator was unable to demonstrate a procedure or instruction linked to the shift log.

Recommendation: Operator to include a procedure in the sites EMS for the requirement for a shift team leader to complete a 'Shift Log' ensuring that site infrastructure is continually maintained and repaired to prevent the escape of odour.

Odour Management Plan (OMP)

The odour management plan is directly linked to the environmental permit. The entire odour management plan was not audited during this visit but the following areas were visited:

- Annual Review

The OMP states that it will be subject to an annual review. The operator was unable to provide a copy of the last annual review and it was clear that it had not been subject to one since its production in 2008. The plan also states that a BAT review will be carried out every 3 years; again this had not been undertaken. This is a breach of the OMP linked to the environmental permit.

Recommendation: Operator to include the need for an annual review and BAT review in the sites Environment Management System (EMS) to ensure that they are undertaken.

- Version number

The OMP does not have a date or version number.

Recommendation: Operator to include a date and version number to ensure that on review everyone is working to the latest document.

- Carbon Filters

There are carbon filters in the louvers located in the waste reception hall. In the event of the building developing positive pressure the air would pass through the activated charcoal neutralising any odour. The OMP states that the carbon filters last 12 to 18 months before they need to be changed. The operator was unable to demonstrate when or if the carbon filters have been changed. This failure is a non-compliance of the environmental permit and has incurred a category 3 score against condition 1.1.2.

Action: Operator to replace the carbon filters installed in the ventilation louvers in the waste reception hall unless it can be demonstrated that they had been changed in the last 12 to 18 months. The need for the maintenance of these filters needs to be incorporated into the sites EMS to ensure they are replaced when necessary in order to remain effective in the prevention of off-site odours.

Action: Operator to review the odour management plan and identify where an update is required. The operator may wish to undertake this review prior to the proposed changes to the new de-duster system as this will need to be included in an updated report.

The non-compliances against the odour management plan have been scored as a category 3 against permit condition 2.3.1 Operating Techniques Table S1.2.

Site Observations

Waste Reception Hall

KD and GL were accompanied by KR throughout the site tour which began at the waste reception hall. In the waste reception hall there was very little unprocessed black bag waste present. Only one shredder was in operation at the time of the visit due to a problem with the smaller primary unit. KR explained that the newer operational shredder was due to be changed next week and the primary shredder was awaiting repair. Shredded waste was also visible in the waste reception hall.

From the walkway in the reception hall damage could be seen to the walls and louvers between the fast acting doors. A question was raised by KD regarding the prioritisation of the repair work as the damage appeared old. Some damage was also evident on the opposite wall to the walkway. It is important that the integrity of the building is continually maintained to retain the negative pressure within it and prevent the escape of odour. Should a positive pressure occur the carbon filters in the louvers help to prevent odour escaping however damage would also impact on their effectiveness. KR explained that the damage to the building is included on the shift log as previously described and this is passed to Mike Arnell (MA) who is responsible for site maintenance. MA then decides on the prioritisation of this work.

Action: Operator to review the maintenance and repair of the louvers on the waste reception hall to prevent

the escape of odour.

Action: Operator to repair damage to the walls and louvers in the waste reception hall.

Processing Hall

The external doorway on the walkway from the waste reception was open so KR closed it as the visit continued through to the processing hall. The process was on stop at the time of the visit however an overview of the process was given to GL. It had been previously explained during the audit that the operator was proposing to further streamline the process. Work on this was evident during the visit as redundant plant was in the process of being removed from this section of the building. Throughout the time in the process hall one of the main roller shutter doors along the northern side of the site was open. Contractor vehicles were parked just outside the open door.

On leaving the processing hall two further doors on the northern side of the building were open. One of the doors had been propped open with a stone despite notices to keep them closed. KR used his radio to notify staff to rectify the matter and the doors were then closed. One of the operatives stated that they had been opened to dry out the building and water was evident on the floor of the entrance to these doors.

The photographs below were taken of open doors on the northern side of the site.



Action: Operator to investigate the root cause of the open doors on the fuel preparation sections of the building and to provide the findings to the NRW.



The photograph opposite was taken inside the RDF store. The store was empty following the change in status of the waste to energy plant. Water was evident on the floor of the store due to high humidity in the building.

It is understood that the operator has also been exploring improved air extraction rates in the processing / fuel preparation area of the plant.

Action: Operator to also provide an update on the timeline for the proposed improvements on the air extraction in the processing /fuel preparation area of the plant.

Recovered Recyclables



During this visit the transfer building for recovered recyclables was visually inspected from the entrance barrier due to vehicle loading at the time. Vehicles were queuing to tip in the building while a Siteserv lorry was being loaded with plastics. Bags of waste could be seen in one of the bays which KR said was paper waste that was being used for mixing with the RDF.

On review of the environmental permit Table S1.1 AR10 states that:

Recovered Recyclables - No more than 500 tonnes to be stored on flat floor within process areas or transferred to roll on/roll-off container in Areas 3.2A, 3.2 B, 3.2C 3.2D, 3.2E, 3.2F and 3.4F.

Following this audit KD cross-referenced the areas listed in the above condition against the relevant site plan. The areas corresponded to different locations on site. This is a non-compliance of the permit which has incurred a Category 3 score against condition 2.1.1 Table S1.1. Furthermore there appears to be an increase in the activity in this section of the site probably as a result of increased waste recycling.

Action: Operator to undertake a review of the recovered recyclables activities on site against the agreed permit activities and to provide a copy of it to NRW.

Recommendation: Depending on the outcome of the above review, should operations have changed from those previously agreed, a permit variation may be required.

Fuel Prep Area and Bio-filter

Prior to the visit into the fuel prep area the measurement of critical parameters on the bio-filter was explored further with Layton Hopkins (LH) the team leader for this section. LH demonstrated on the WTT system the parameters monitored on the bio-filter. LH explained that when the temperature on the bio-filter goes above 40°C the measurement on the system turns red and then some-one has to manually spray water in the unit. LH confirmed what had been explained previously by KS and KR in that a daily print out of the WTT system takes place in the morning and this is placed in a file. KD requested to see the print outs from the WTT system for the bio-filter and requested a copy from the 2 October 2013 which showed the temperature in the bio-filter at 42.2°C. From a brief look through the file there were a number of print outs where the temperature in the bio-filter had exceeded 40°C. The audit identified that an elevated temperature in the bio-filter requires action to be taken by the operatives however there did not appear to be a procedure for the manual spraying of water on the biofilter media.

Recommendation: Operator to review operatives having to manually spray water in the bio-filter to maintain the humidity and temperature of the media.

Ammonia and humidity is also a critical parameter on the bio-filter as the micro-organisms are only active in a humid environment. However these did not appear to be parameters that are monitored by the WTT system. The WTT system for the bio-filter is only accessible during working hours. During the recent hot summer months both day and night temperatures in the bio-filter could have exceeded the optimum parameters rendering it ineffective. Once the bio-filter exceeds the optimum temperature the micro-organisms become less effective and if the temperature is too high they die. The odour management plan for the site states that the optimum temperature of the biomass is between 30 and 40°C. However following the replacement of the bio-filter media in 2011 the operator's response to improvement condition 9.48 states an optimum temperature for the bio-filter media is between 20-38°C. The monitoring protocols for the biofilter as outlined in IC9.48 and linked to the operating techniques for the site were not demonstrated in respect of the following:

- On a daily basis humidity levels and temperature levels in the bio-filter will be monitored to ensure they are within the specified operating requirements.

This is a non-compliance of the environmental permit and has been scored a category 3 against the management of the site condition 1.1.1.

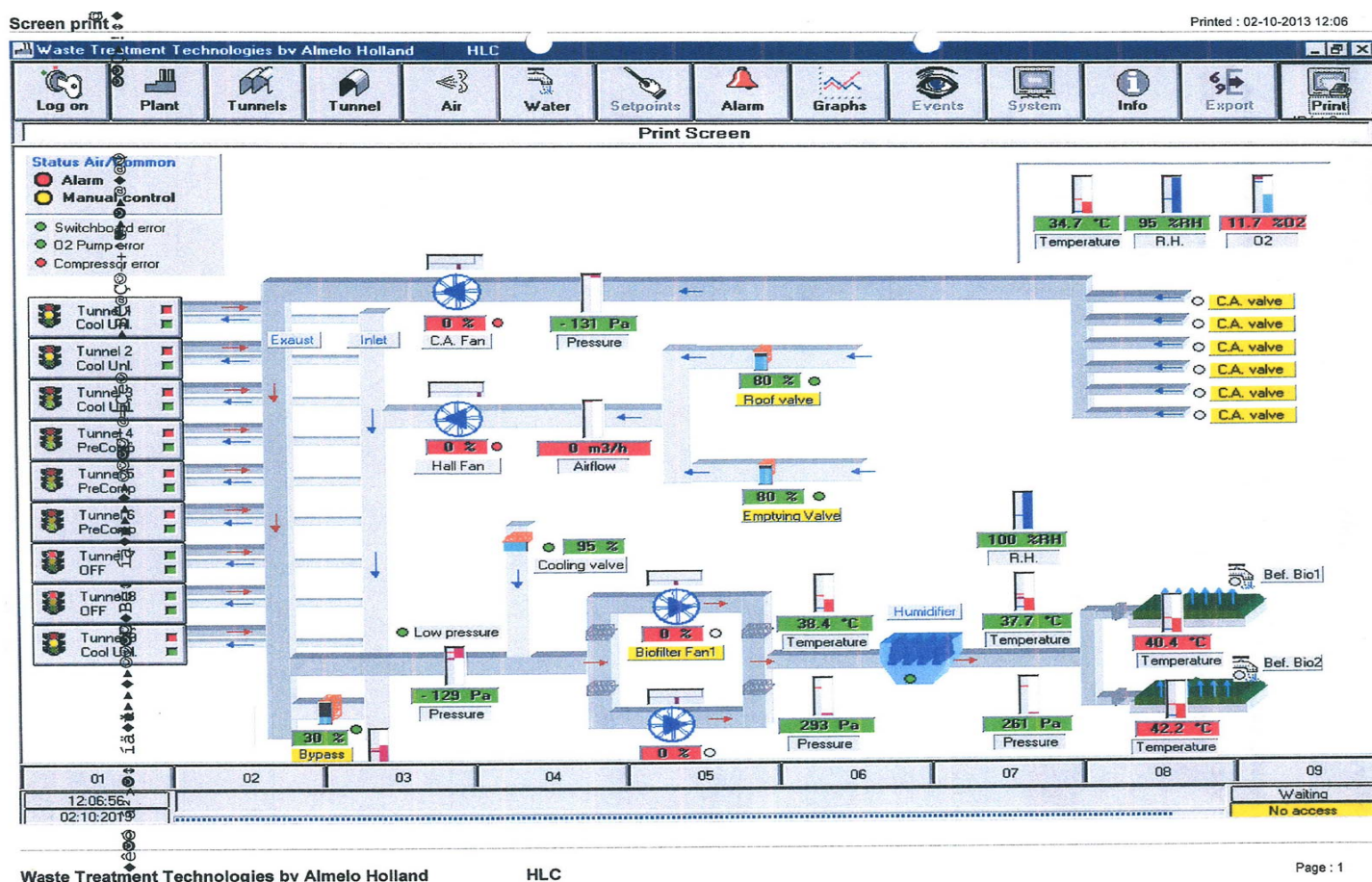
Action: Operator to review improvement condition 9.48 response against the current OMP and update it to reflect the correct critical parameters for the operation of the bio-filter.

Action: Operator to trend the critical parameters for the operation of the bio-filter in order for action to take place prior to an exceedance of the operating requirements.

Action: Operator to include the monitoring protocol for the bio-filter in the EMS for the site to prevent a non-compliance.

Recommendation: Operator to consider who should have access to the WTT system in order for action to be taken prior to an exceedance of a critical parameter on the bio-filter.

Screen Print of the WTT System from 2-10-2013



On review of the print out from the WTT system there appeared to be a number of occasions when the fans were at 0% this would suggest that the system is down. A print out from the day of the visit also stated the airflow was at 0m³/h and the fans were all at 0%.

Action: Operator to explain why the fans and airflow shows 0% on the WTT system.

The photograph opposite was taken of the new de-duster unit installed on the fuel prep area. The installation of the new de-duster unit was a health and safety requirement in this area and was subject to planning. NRW as statutory consultees on the planning permission had recommended that a variation would be required to the

permit for an additional emission point. However the operator directed the stack back into the building. KD asked if the emissions from the de-duster have been ducted into the bio-filter as particles can block the media rendering it ineffective. Improvement Condition 9.48 on the bio-filter states:

The presence of solid substances in the airflow (dust) has a negative effect on the material as it can lead to blocking up the air flow preventing the air getting to the material.

Action: Operator to confirm if the emissions from the new-duster have been routed into the airflow system linked to the bio-filter.

In the fuel prep area an ammonia smell was evident. LH explained the RDF production at the MREC for the benefit of GL and then the visit proceeded to the in-vessels above which the bio-filter unit is located. KR progressed to above the in-vessels however due to the humidity in this section of the fuel prep area it was exited via the south side. The door on this side of the building was also open due to damage and this was raised internally by KR on return to the office. Back at the office KD and GL provided brief feedback on the audit to the Operations Manager Chris Roberts as staffing matters relating to the status of the WTE plant were taking place at the time of the visit.

Conclusion

NRW continues to receive complaints of odour from the MREC. Therefore this audit sought to assess measures undertaken at the site to prevent off-site odour against the requirements of the environmental permit.


Non-compliances of the environmental permit were identified during this audit that related to the prevention of off-site odour, these included breaches of the:

- approved odour management plan;
- agreed operating techniques and;
- management of maintenance records regarding the carbon filters.

These non-compliances in combination with a substantiated (category 3) odour complaint on the morning of the visit is a breach of the odour condition in the environmental permit (3.3.1). As a result a warning from NRW has been given on this CAR form. Furthermore a number of actions have been placed in this report (See Table 4 below) in order to bring the operator back into compliance.

In recent months a number of staff changes have taken place at the MREC which has impacted on individual's roles and responsibilities. Furthermore the WTE section of the plant was mothballed in September 2013 which has also seen a staff restructure. Despite this the operator is progressing with the proposed replacement of the de-duster system on the waste reception hall to further address the potential for odour release. However it is important that existing plant and infrastructure is maintained and operated in line with the specified operating requirements. Any proposed improvements can then build on the measures already in place to prevent off-site odour.

[END]

	EPR Compliance Assessment Report	Report ID: 5301
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) Ltd	Date of Visit 10 October 2013

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.	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>
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			
NB/ Some actions below do not have a CCS breach against it as a single breach of a condition is only record once to prevent double counting.			
N/A		Recommendation: A change to the existing plant set up will require a variation to the environmental permit for the site. Furthermore a BAT assessment will be required to support the application for the change and modelling of any additional or changes to the emissions to air. It was advised during this audit that this work should be undertaken soon to prevent any delays to the change to the de-duster.	N/A
		Recommendation: Operator to include a procedure in the sites EMS for the requirement for a shift team leader to complete a 'Shift Log' ensuring that site infrastructure is continually maintained and repaired to prevent the escape of odour.	N/A
		Recommendation: Operator to include the need for an annual review and BAT review in the sites Environment Management System (EMS) to ensure that they are undertaken.	N/A
-	-	Action: Operator to replace the carbon filters installed in the ventilation louvers in the waste reception hall unless it can be demonstrated that they had been changed in the last 12 to 18 months. The need for the maintenance of these filters needs to be incorporated into the sites EMS to ensure they are replaced when necessary in order to remain effective in the prevention of off-site odours.	14 /12/13
F1	3	Action: Operator to review the odour management plan and identify where an update is required. The operator may wish to undertake this review prior to the proposed changes to the new de-duster system as this will need to be included in an updated report.	14/12/13

G3	3	Action: Operator to review the maintenance and repair of the louvers on the waste reception hall to prevent the escape of odour.	14/12/13
-	-	Action: Operator to investigate the root cause of the open doors on the fuel preparation sections of the building and to provide the findings to the NRW.	14/12/13
-	-	Action: Operator to also provide an update on the timeline for the proposed improvements on the air extraction in the processing /fuel preparation area of the plant.	14/12/13
A1	3	Action: Operator to undertake a review of the recovered recyclables activities on site against the agreed permit activities and to provide a copy of it to NRW.	14/12/13
N/A		Recommendation: Depending on the outcome of the above review, should operations have changed from those previously agreed, a permit variation may be required.	N/A
C2	3	Action: Operator to review improvement condition 9.48 response against the current OMP and update it to reflect the correct critical parameters for the operation of the bio-filter.	14/12/13
-	-	Action: Operator to trend the critical parameters for the operation of the bio-filter in order for action to take place prior to an exceedance of the operating requirements.	14/12/13
B5	3	Action: Operator to include the monitoring protocol for the bio-filter in the EMS for the site to prevent a non-compliance.	14/12/13
N/A		Recommendation: Operator to consider who should have access to the WTT system in order for action to be taken prior to an exceedance of a critical parameter on the bio-filter.	N/A
-	-	Action: Operator to explain why the fans and airflow shows 0%on the WTT system.	14/12/13
-	-	Action: Operator to confirm if the emissions from the new-duster have been routed into the airflow system linked to the bio-filter.	14/12/13

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**.