

Compliance Assessment Report

**Report ID:
CAR_NRW0026500**

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

Site	The Research Centre	Permit Ref	SP3936TL		
Operator/Permit holder	Cenin Limited				
Regime	Installations				
Date of assessment	11/10/2016	Time in	10:00	Out	12:15
Assessment type	Audit				
Parts of the permit assessed	All				
Lead officer's name	Chris Thomas				
Accompanied by	Ellar, David				
Recipient's name/position	Gary Hunt/ Manager	Date issued	12/01/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
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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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Natural Resources Wales Audit of Cenin Limited on the 11th October 2016.

Present: Martyn Popham , Gary Hunt, Wyndham Abbot (Cenin)
Chris Thomas, David Ellar (NRW)

1. Gary Hunt gave an update on the latest work taking E Cat – a hazardous waste from Valero and using it in production at the Rockwool site. The E Cat should replace Bauxite which is currently shipped in from Greece. This trial appears to be going well, however further work is required to reduce sulphur and chloride emissions from the process. Currently Valero do not produce enough of the E cat to satisfy demand. Therefore Cenin are looking at alternative sources. The EWC Code of the waste is 16 08 04 and is an inert waste. Please can you add this waste code to your permit to ensure compliance. The following links are relevant to your operation:

<https://naturalresources.wales/apply-for-a-permit/installations/apply-to-vary-change-a-permit-for-installations/?lang=en>

You need to vary your bespoke installation. Please feel free to give me a ring to discuss.

2. Gary also gave an update on Cenbed. Due to other work developing well and the regulatory issues by the use and subsequent disposal of Cenbed, the work on the alternative animal bedding material has been stopped for now. However, should changes in regulation and/or interpretation of legislation occur in future I feel that there still is a possibility this use of waste is beneficial and should be developed further if the opportunity arises.

3. An auditor for the ISO 14001 scheme raised concerns over the continuous stack monitoring that was occurring on site. He stated that the continuous recording – not the actual monitoring – was not in place at the time. Cenin explained that this is an issue with the computer systems and that monitoring is continuous. I have reviewed our data received and I am content that at no point has the ELV been breached. However please ensure that your monitoring systems are available for inspection at all times in the future.

4. Cenin are also currently exploring further trial work with Aberthaw Power station. They intend to combine quarried Gritstone dust – which currently has no real market or use – and Paper Sludge Ash with the PFA to create a cementitious product. Again this could divert valuable resources away from landfill and I am fully supportive of this trial. Cenin intend to site equipment for the 1000 tonne trial and see if their concept works. **I have contacted the relevant Regulating Site Officer for NRW who should be contacting you in the near future.**

5. Gary Hunt raised concerns over the End of Waste position of Hydraulic road binders. Cenin feel that they are in compliance with European standards and End Of Waste requirements. Can **Gary send through an email clarifying the issue and explaining Cenins position please?**

6. As discussed on site I am happy that an electronic signature is used to sign the Duty of Care

documents arising from UPM Shotton.

7. Chris Thomas and David Ellar were given a tour of the Cenin site. We found no areas of concern. The site was secure, clean and in line with permitting requirements.

Regards

Chris Thomas 0300 065 3313

EPR Compliance Assessment Report

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Operator/Permit holder	Cenin Limited	Date	11/10/2016

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			

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 reports 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 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.