

EPR Compliance Assessment Report

Report ID: BX64211Y/0183261

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

Site	Amlwch Plastics Works		Permit Ref	BX64211Y	
Operator/ Permit holder	Rehau Limited				
Date	18/06/2013	Time in	10:35	Out	16:00
What parts of the permit were assessed	Permitted Activities, Accident Management, Waste Management				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Richard Bladon/SES Manager				
Officer's name	Lara Cubley	Date issued	16/07/2013		

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	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	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	A	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (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

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

This report should be clear, comprehensive, unambiguous and completed within 14 days of an assessment.

Site Inspection and process walkthrough

A thorough site walkover of external areas and the process from goods in to dispatch was undertaken.

Good housekeeping was evident throughout the site and no amenity issues were noted, however, see section on Noise below.

One line was running pvc lead stabiliser tambour production. Due to progress made in phasing out lead stabilisers it is anticipated that the Operator will be able to shift away from lead use completely. When such a time arises the Operator is advised to get in contact to discuss Permit surrender requirements.

The Operator has recently installed a 3,000l solvent cleaning facility for cleaning paint at product change over. The facility is fully sealed and represents BAT with emissions from the room treated via the thermal oxidiser and regulated by the Local Authority. Solvent is recovered by the system via distillation.

Emissions to air

This site inspection was conducted during the monitoring of emissions to air from the lead mixing process via emission point A1. Scaffolding was erected and monitoring for lead and particulates being conducted by a contractor. The site specific sampling protocol was provided and monitoring procedures were being followed as per permit requirements.

Emissions monitoring from the thermal oxidiser was also being conducted on the day of the visit as regulated by the Local Authority.

Noise

The chillers were inspected and the potential noise impact discussed. Running of the chillers was not witnessed as they did not activate at the time of the inspection. Screening walls have been constructed complete with acoustic cladding. The standby chiller is ran twice a month to ensure it's operationally functional when required. This is completed during normal daytime working hours to minimise potential noise impact. The Operator has agreed to notify Natural Resources Wales of when the standby chiller is to be ran for the next two occasions, in advance of operation.


The Operator is advised to ensure factory doors are closed to prevent any noise impact, (in particular, as noted in the re-grind area).

Accident Management/Emergency Preparedness and Response

A spreadsheet was provided, PPC Permit BX64211Y - REHAU Ltd - Accident Risk version 5. This identifies the various hazards and resultant risks together with mitigation measures in place. The Emergency Action Procedure revision 4 was provided. This was last checked and approved in March. The procedure apportions responsibilities, defines what is meant by an Abnormal Environmental Release, and defines the action to be taken in certain identified eventualities. It also confirms internal and external reporting lines, including corrective action reporting. More information is covered in other water and air management procedures.

Waste Management

The plant procedural instruction for waste management approved on 17/06/13 was provided. Follow up since the inspection has confirmed the checks made by the Operator prior to consigning waste off-site and these will be incorporated into the next version of the procedure. The Operator was advised to ensure checks are made even when employing a waste broker as liability sits with the producer of the waste under Duty of Care legislation.

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report	Report ID: BX6421IY/0183261
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Operator/ Permit	Rehau Limited	Date
		BX6421IY 18/06/2013

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 checked="checked" type="checkbox"/>	X
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 type="checkbox"/>	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>	

Section 4- Action(s)			
Where 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 the Natural Resources Wales (NRW) to fulfill 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 (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.

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 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 607 0987.