

EPR Compliance Assessment Report

Report ID: BX6421IY/0210585

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

| | | | | | |
|--|----------------------------|---------------|--------------|----------|-----------------|
| Site | Amlwch Plastics Works | | Permit Ref | BX6421IY | |
| Operator/ Permit holder | Rehau Limited | | | | |
| Date | 09/05/2014 | Time in | 10:30 | Out | 14:45 |
| What parts of the permit were assessed | OMA | | | | |
| Assessment | Audit | EPR Activity: | Installation | X | Waste Op |
| | | | | | Water Discharge |
| Recipient's name/position | Richard Bladen/SES Manager | | | | |
| Officer's name | Lara Cubley | Date issued | 06/06/2014 | | |

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 | |
|--|--|---|--|
| Infrastructure | 1. Engineering for prevention & control of pollution | N | |
| | 2. Closure & decommissioning | A | |
| | 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 | A | |
| | 2. Management system & operating procedures | A | |
| | 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 | A | |
| | 2. Land & Groundwater | N | |
| | 3. Surface water | N | |
| | 4. Sewer | N | |
| | 5. Waste | N | |
| 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 | A | |
| | 3. Maintenance records | N | |
| | 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 (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

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 normally completed within 14 days of an assessment.

The Site was visited to conduct an OMA audit. A general site walkover was also conducted and no amenity issues were noted with housekeeping being of a high standard. One drain on the side of the building was noted to be overflowing across the yard but is unlikely to be of environmental significance with regard to impact. Discussions surrounding surrender of the Permit were had and advice provided. The Operator will be providing a scope for site closure for surrender purposes towards the end of summer 2014.

OMA audit conducted returned a score of 96% for emissions to air which demonstrates an extremely high standard. Well done.

Minor recommendations made in the OMA report are to be reviewed by the company and information required submitted.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.



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| | | | |
|------------------|-----------------------|--------|------------|
| Site | Amlwch Plastics Works | Permit | BX6421IY |
| Operator/ Permit | Rehau Limited | Date | 09/05/2014 |

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.

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.

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

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.

| Summary sheet | | |
|---|--|---------------------------------|
| Permit Number: BX6421IY | | Compliance Officer: Lara Cubley |
| Operator: Rehau | | Auditor (if different): |
| Emission Point(s): A1 | | Others Present: Richard Bladon |
| OMA Sections | | SCORE |
| OMA 1 – Management of monitoring | | 25 |
| OMA 2 – Periodic monitoring and test laboratories | | 39 |
| OMA 3 – Continuous monitoring | | |
| OMA 4 – Quality assurance | | 27 |
| | | OVERALL SCORE |
| | | 91/95 96% |
| OVERALL SITE ASSESSMENT COMMENTS | | Letter |
| | | Variation |
| | | Enforcement |
| | | |
| | | Signed: L Cubley |
| | | Date: 09/05/14 |

OMA 1: Management of monitoring

| OMA ELEMENTS | SCORE | COMMENTS |
|--|-----------------------|--|
| A. Documentation of management system procedures for monitoring | 5 | Fully documented and formal EMS with up to date and controlled Air Management Procedure that covers monitoring. SSP produced prior to all monitoring visits under MCERTS. |
| B. Organisational structure for monitoring | 5 | Formally documented responsibilities within the procedure. Resources are available as is a deputy if required. |
| C. Schedules and planning of monitoring, including contingencies | 5 | Schedules are produced for monitoring on an annual basis and adhered to. These include reporting. |
| D. Monitoring records and use of monitoring data | 5 | Results are reviewed and trending is undertaken. |
| E. Understanding the requirements of the permit and monitoring methods | 5 | Monitoring requirements are fully implemented. Emissions Protection Advisor displays an understanding of the requirements and has attended CES Emissions Monitoring Training course in 2010. Other personnel MCERTS awareness course attended and all monitoring technicians have MCERTS Level 1 or 2. |
| OMA 1 – SCORE | 25/25 100% | |

SUMMARY COMMENTS FOR OMA 1

1C – The Operator should ensure monitoring schedules ensure that representative operations are monitored. The Operator is to provide evidence of mixing activity during last monitoring round.

OMA 2: Periodic monitoring and test laboratories

| OMA ELEMENTS | SCORE | |
|---|------------------------|---|
| A. Sampling provisions <i>Critical Element</i> | 4 | All TGN M1 requirements are met for the sampling facility which is provided with scaffolding as required apart from meeting the 5 hydraulic diameters downstream. |
| B. Certification of equipment | 5 | MCERTS certified equipment and methods employed with relevant ranges. |
| C. Measurement methods and standards <i>Critical element</i> | 5 | Relevant methods complied with in full. |
| D. Calibration methods <i>Critical element</i> | 5 | Equipment calibrated and checks on paperwork with certificates included in reports. MCERTS and UKAS accreditation. |
| E. Frequency of maintenance and calibration | 5 | MCERTS and UKAS accreditation. |
| F. Reliability of equipment (data availability) | 5 | Reliable with over 95% availability. |
| G. Breakdown response | 5 | Availability of MCERTS contractor and equipment has no issues. |
| H. Traceability | 5 | MCERTS and UKAS accreditation. |
| OMA 2 – SCORE | 39/40 97.5% | |

SUMMARY COMMENTS FOR OMA 2

2A – Confirm compliance with flow criteria and homogeneity test.

| OMA 3: Continuous monitoring | | |
|--|-------|----------|
| OMA ELEMENTS | SCORE | COMMENTS |
| A. Provisions for monitoring and location of CEMs <i>Critical Element</i> | n/a | |
| B. Certification of CEMs | | |
| C. Calibration methods <i>Critical element</i> | | |
| D. Frequency of maintenance and calibration | | |
| E. Reliability of equipment (data availability) | | |
| F. Breakdown response | | |
| G. Traceability | | |
| OMA 3 – SCORE | n/a | |
| SUMMARY COMMENTS FOR OMA 3 | | |
| No continuous monitoring requirements in Permit. | | |

| OMA 4: Quality assurance | | |
|---------------------------------------|--------------|---|
| OMA ELEMENTS | SCORE | COMMENTS |
| A. External quality control schemes | 5 | MCERTS and UKAS accreditation. |
| B. Internal data quality control | 4 | The Operator reviews all monitoring data and reports. Trending is conducted with emission limits used as cap. |
| C. Competence of monitoring personnel | 5 | MCERTS certified to appropriate level and with checks on certificates undertaken. |
| D. Auditing of monitoring | 4 | Operator has fully documented up to date EMS. STA checksheet conducted for all monitoring visits as audit aid memoire. The Operator could ensure that auditing covers own in-house procedures as well as auditing contractor. |
| E. Audit compliance | 4 | Completed records of STA checksheets. |
| F. Reporting | 5 | MCERTS and high reporting standards meeting Permit requirements. |
| OMA 4 – SCORE | 27/30 90% | |
| SUMMARY COMMENTS FOR OMA 4 | | |
| | | |