

Compliance Assessment Report CAR_NRW0040422

Permit being assessed: UB3897TG.

For: Bpi Recycled Products, held by British Polythene Limited

At: Rhymney, Tredegar, NP22 5PY.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 20/09/2022 between 11:00 and 12:00.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Carla Curtis.

Report sent to: Ben Thomas / Sean Finnermore , Site Manager / Environmental Manager
on 29/09/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This report details the site visit made on the 20th September 2022 to British Polythene Limited, Permit number EPR-UB3897TG.

NRW Officers Greg GARDNER and Carla CURTIS attended the British Polythene Limited Site at Block 3 Maerdy Industrial Estate, Rhymney, Tredegar, NP22 5PY for a routine site inspection at 11:00am where we met with the Site Manager Mr. Ben THOMAS and Environmental Manager Mr. Sean FINNEMORE. The weather was dry, and reasonably mild which it had also been the previous day.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact or effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

PERMIT BREACHES / ACTIONS

No permit breaches / actions have been identified during this site inspection.

PERMIT HISTORY

See extract from EPR-UB3897TG regarding permit history.

Status log of the permit

Description	Date	Comments
Application EPR/UB3897TG/A0001	Duly made 24/04/13	Application for non-hazardous physical treatment facility - polythene recycling.
Response to Schedule 5 notice	13/05/13	Site drainage description, amended environment management system and site specific risk assessment.
Additional information received	18/06/13	Site drainage description, amended drainage plan, discharge consent and specifications of interceptor.
Permit determined	04/10/13	Permit issued to British Polythene Limited

GENERAL OBSERVATIONS

BPI, Rhymney operate under a bespoke environmental permit. This permit is for a non-hazardous physical treatment facility which recycles waste polythene 24 hours a day, 7 days a week. Treatment operations shall be limited to washing, shredding, pelletising, bailing and heating of polythene waste for the purposes of recovery only. The maximum quantity of waste accepted and processed on site shall not exceed 30,000 tonnes per year. The site was in operation at the time of the visit and there was no waste of any type stored outside of the permit boundary.

SITE INFRASTRUCTURE

During the site inspection, the general housekeeping was in very good condition with very little amounts of loose debris located on the floor (see photo 1). The outside waste plastic storage area was inspected. The height of the stored waste plastic bales was not of concern with sufficient segregation in place between waste plastic stockpiles (see photo 2). Just as a reminder to the operator, please continue using best practices with regards to storage of waste plastic bales with sufficient segregation between stockpiles to prevent potential fire spread in the unlikely event a fire occurs.

The site had 1 metre high netting located along the inside perimeter of the security fencing to prevent any debris from leaving site (see background left of photo 3). If any debris has left site, on site employees promptly remove said debris to ensure minimal impact on the environment. No waste(s) / debris was witnessed by NRW Officers outside of the permitted boundary during the site inspection.

It was also noted that the concrete impermeable flooring was in good condition with no concerns identified. The site have undertaken infrastructure improvements, such as drainage, in certain areas. Further improvement works are planned and is positive to see the company taking proactive steps to improve infrastructure conditions to minimise environmental impact should a loss of containment occur (see photo 4).

Large skips were present on site which housed the various waste packaging from materials brought in (metals / wood / cardboard etc). These were all stored securely within the large skips and removed from site, when required, and transported to licenced waste facilities (see photo 4). There was no issues identified with the housekeeping / storage of these large skips.



Photo 1 - Good housekeeping practices located in yard outside and on site in general



Photo 2 - Segregated areas of waste plastic stockpiles



Photo 3 - Litter netting located along perimeter of security fencing (background left)



Photo 4 - Infrastructure improvements on site and storage of large waste skips

WASTE ACTIVITIES - WASTE POLYTHENE TREATMENT

Mr. THOMAS and Mr. FINNEMORE escorted NRW Officers around site and provided an overview of the production process. The housekeeping within the enclosed buildings was in very good condition with no loose debris located within the production facility. There were good environmental practices witnessed such as the secondary containment bund of liquids should there be a potential loss of containment (see photo 5). BPI have also installed new covered conveyor belts as well as covers over existing conveyor belts which helps mitigate noise emissions as well as improve housekeeping on site by reducing plastic pellets escaping from the production line. This was evident during the site inspection and a good practice to witness (see photo 6).



Photo 5 - Secondary containment bund for liquid storage



Photo 6 - Enclosed conveyor belts to reduce noise and improve housekeeping

WASTE ACTIVITIES - NOISE

BPI have historically had complaints arise regarding noise emissions from their site due to their on site processes / equipment. Proactive discussions took place between NRW Officers, Mr. THOMAS and Mr. FINNEMORE regarding noise emissions and previous complaints with actions BPI have taken to reduce / eliminate further potential complaints. During this site inspection an AHU (Air Handling Unit) was recently installed and commissioned which has assisted in the mitigation of noise (see photo 7). This was evident during the inspection with noise witnessed by NRW Officers however not deemed excessive. BPI have an automatic open / close system on all their roller shutter doors which were operational during the time of the inspection. It has been agreed on previous inspections, as well as this one, that these doors remain closed when not in use which again has assisted in the mitigation of excess noise emissions (see photo 8).



Photo 7 - Newly installed Air Handling Unit (AHU)

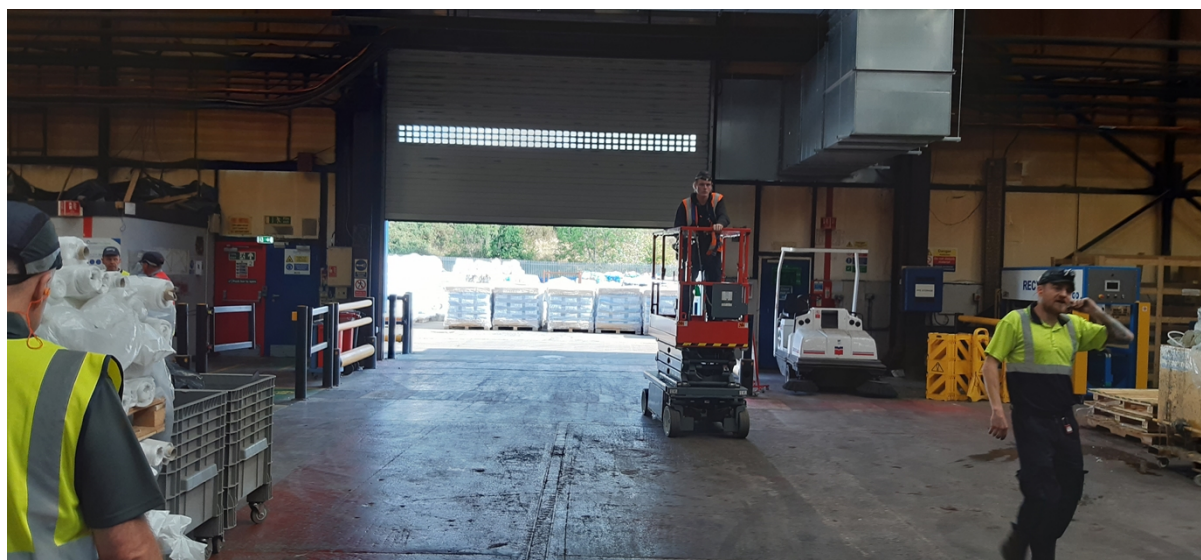


Photo 8 - Automatic roller shutter doors in operation during site visit

WASTE RETURN SUBMISSIONS

BPI, Rhymney have submitted their waste return data for permit, EPR-UB3897TG, on time and in full. To date (2022), the site has received 4,744.68 tonnes of waste(s) and removed 1,034.09 tonnes of waste(s). There are no unauthorised wastes that have been accepted on site and are within the annual permitted allowance for the amount of waste to be accepted (30,000 tonnes).

NRW Officers Greg GARDNER and Carla CURTIS left site at 12.00pm the same day.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

I look forward to working with the site further in the future.

Thank you.

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

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.