

Compliance Assessment Report CAR_NRW0040582

Permit being assessed: PB3393HD.

For: Roydon Bottle Recycling Ltd, held by Roydon Bottle Recycling Ltd

At: Pontllanfraith, Caerphilly, NP12 2XN.

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

On 04/10/2022 between 10:00 and 11:30.

Parts of permit assessed: A, B, C, D, F, G

NRW Lead Officer: Carla Curtis, accompanied by Alex Bowder.

Report sent to: Phil Hopkins, Matthew Chamberlain, Site Manager, TCM and Health and Safety Manager on 24/10/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B5 - Infrastructure - Plant and equipment	C3 Minor	2.3 Operating techniques
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
environment		
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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
1	4

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?

Criteria	Action needed	Complete by
B3	Ensure that the drain filters are cleaned on a regular basis to avoid blockages, please send a copy of the drainage system plan so we can review and save a copy on file.	31/10/2022
B5	Remediate area of water pooling. Improvements must be made to operations to enhance containment procedures and prevent water soaking out of the material and pooling in the unit.	31/10/2022

Action criteria codes are listed in the 'Important information' section below.

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 compliance report details the site inspection conducted by Natural Resources Wales (NRW) Officers on 4 October 2022 at Roydon Bottle Recycling Ltd, Blackwood Business Park, Newport Rd, Pontllanfraith, Blackwood NP12 2XN- Permit number **EPR-PB3393HD***

Senior Regulation Officer Alex BOWDER and Officer Carla CURTIS attended at Roydon Bottle Recycling Ltd at 10:00 to conduct an introductory inspection for the Quarter 3 compliance year 2022-23. Site Manager Phillip Hopkins was present, Matthew Chamberlain (Health and Safety Manager) accompanied officers around the permitted area. Weather conditions were mild and overcast at the time of inspection.

PREVIOUS SITE COMPLIANCE ISSUES

- The operator had failed to submit its Waste Return documents from Quarter 4, 2019. It is essential

to submit your Returns data to NRW on-time to allow us to assess your waste inputs and outputs, even if for a null-return. Operators have a one-month grace period to submit quarterly/annual returns.

All waste returns appear to have been received, please continue to submit these in a timely manner.

PERMIT BREACHES

Breach – Category 3

B5 – Plant and equipment| Condition 2.3 - Operating techniques

The site had halted operations and was in the process of carrying out maintenance work on machinery and resurfacing the factory floor. This resulted in a significant build-up of sludge material being stored inside the door as the de-watering screw was not operating to full capacity. This resulted in the paper sludge retaining a higher water content than usual. Subsequently, water was seen soaking out of material and pooling around machinery and walkways in the area.

It seems that there is no contingency plan in place for when machinery stops working. A back-up plan should be created for all operations in the EMS document.

ACTION

Remediate area of water pooling.

Improvements must be made to operations to enhance containment procedures and prevent water soaking out of the material and pooling in the unit.

Deadline 31 October 2022

GENERAL OBSERVATIONS AND WASTE ACTIVITIES

Most of the plant was non-operational at the time of inspection due to resurfacing works. The site had halted operations and was in the process of carrying out maintenance work on machinery and resurfacing the unit floor, which was taking place at the time of inspection. (See image 1)



Image 1 - Picture showing the factory floor being resurfaced



Image 2 - Showing water soaking out of wastepaper sludge pile

On inspecting the grounds outside it was observed that the filters in the drains were quite congested. (See image 3). Please ensure that these are cleaned regularly to avoid blockages. The officers suggested that Roydon Bottles send a copy of the drainage system plan so we can review and save a copy on file. Officers were shown the DCWW discharge consent location coming from the building. No issues were noted.

Officers were shown the sampling and testing laboratory where produced materials are quality tested as to their composition, grade and suitability for product. Near these sections, Officers witnessed tonne-bags filled with recycled plastic waste containing other wastes, such as metal springs. This seemed to be here for some time

There was a big pile of waste in one of the bays (See image 4), the officers enquired what is happening with this, operator advised that this was rejected waste that would be going back to the Swinton site, this happens on a weekly basis. Officers raised the issue of fire risk and questioned how long this material is typically stored on site.

ACTION:

Improvements must be made to operations to enhance containment procedures and prevent water soaking out of the material and pooling in the unit.

Advisory Note:

Ensure that the drain filters are cleaned on a regular basis to avoid blockages, please send a copy of the drainage system plan so we can review and save a copy on file.

STORAGE OF HAZARDOUS MATERIALS

Officer witnessed IBCs labelled to contain hazardous components stacked near the shutter door. Officers questioned whether these were empty or were intended for some other purpose. It was stated that they did not contain any wastes or fluids and were simply stacked for storage. Other IBCs were appropriately stored elevated and appropriate secondary containment standing.

HEALTH AND SAFETY

During the inspection, Officers witnessed staff operating grinding equipment without wearing appropriate personal protection equipment, such as protective eyewear. Whilst this is not direct remit of the waste permit, the operator must ensure that staff are always adhering to safe working practices. Officers requested for a message to be relayed to all staff with regard to this.

Environment Management System documents were not evaluated during the inspection. This will be looked at later in the compliance year.



Image 3 - Picture showing congested filter in drain



Image 4 – This is a pile of rejected waste that is returned to Swinton site weekly.

ACTION:

Improvements must be made to operations to enhance containment procedures and prevent water soaking out of the material and pooling in the unit.

Advisory Note:

Ensure that the drain filters are cleaned on a regular basis to avoid blockages, please send a copy of the drainage system plan so we can review and save a copy on file.

TCM

Mr Philip Hopkins has recently completed continuing certificate under WAMITAB, expiry date is not until 17 March 2024.

Waste Return

Waste returns must be submitted to NRW quarterly, within one month of the end of each quarter. Wilfred Sumner is responsible for submitting waste returns for the site. The maximum total quantity of waste accepted at the site per year shall not exceed 25,000 tonnes. Waste returns

appear to be up to date and within permit limits. Please continue to submit these in line with your permit. On 18/07/22, correspondence with Roydon Bottle Recycling Limited indicated that their waste returns were submitted on time and in full a total of 4070 tonnes (EWC 191204) received during Q1, 2022 with 1702 tonnes removed.

If you have any issues with this report, please contact NRW at carla.curtis@cyfoethnaturiolcymru.gov.uk

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.