

Compliance Assessment Report CAR_NRW0041019

Permit being assessed: BV5858IW.

For: Pyle Waxes EPR/BV5858IW, held by Abril Industrial Waxes Ltd
At: STURMI WAY VILLAGE FARM INDUSTRIAL ESTATE , PYLE, CF33 6NU.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Quarter four and annual returns 2022

NRW Lead Officer: Dale Padfield.

Report sent to: Nez Radka, Operations Manager on 31/01/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

Abril Industrial Waxes

Permit Number BV5858IW

The purpose of this compliance assessment report is to review the quarterly monitoring returns for quarter four (October to December) 2022 and to review the annual returns as required by permit condition 4.1.2. All reports were received on the 26th of January 2023.

Quarterly reporting for emissions to Air and Sewer

The quarter four report showed no emissions to air during this period. The emissions to sewer report showed all parameters to be within the consent limits.

Annual returns – Waste disposal and recovery

Hazardous waste produced by site showed a significant increase when compared to previous years, with an increase of 5.301 tonnes when compared to 2021 data. Abril waxes reported that this increase was primarily in waste packaging due to the unavailability of bulk raw materials. Non-hazardous waste production was also significantly increased when compared to 2020 and 2021 figures but looked relatively consistent with the years preceding these. Abril reported that the increase non-hazardous waste in 2022 was due to the disposal of redundant material, products, and equipment. As such, total waste per unit output has increased when compared with 2020 and 2021, however, does appear slightly decreased on preceding years. Despite the increase in overall waste generation overall trends appear to be improved. It is appreciated that economic impacts on supply have been partly to blame for the increase in hazardous waste, with increases in non-hazardous waste due to a site clean-up.

Annual returns – Water usage

A total of 175m³ of water was used by the site in 2022, a decrease of 30m³ when compared to 2021 figures. Water used per unit output shows a marginal decrease. However, NRW are pleased to see that this parameter has decreased year on year since 2018, suggesting overall water efficiency is increasing.

Annual returns – Energy Usage

Primary energy usage shows a significant decrease in 2022 when compared to annual figures from 2014 through to 2021. CO₂ produced per unit output shows a significant decrease on both 2020 and 2021 figures but appear consistent with those reported for 2016 to 2019. Abril also note that electricity is now sourced from 100% renewables.

A summary of the minutes from the management review meeting was received as required by permit condition 2.7.2 which details the tracking of the energy usage at the facility. No abnormal trends in energy usage were identified. Abril are seeking to upgrade the energy supply to allow new handling equipment to be installed.

A summary of Abril's objectives and targets was received as required by permit condition 4.1.5. Under the environmental heading the only objective listed is breaches of the environmental permit with a target of zero.

Although this is certainly an important objective, Abril should consider expanding the environmental objectives to include targets for water and energy usage and waste generation. Although energy usage is captured and monitored as a KPI, having objectives and targets in these areas may help provide focus on looking for opportunities for improvement, benefiting the environment and potentially saving the business cost.

All reports are accepted.

END.

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.