

Compliance Assessment Report CAR_NRW0042055

Permit being assessed: QB3032RW.

For: Swansea Baling Plant, held by City And County Of Swansea

At: Swansea Enterprise Park, Swansea, SA6 8QN.

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

On 23/06/2023 between 12:10 and 13:50.

Parts of permit assessed: MRF Activities

NRW Lead Officer: Sally Wakeford, accompanied by Michael Edwards.

Report sent to: Chris Fender, Waste Manager on 03/07/2023.

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)	
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

On 23 June 2023 an unannounced Materials Recycling Facility (MRF) site inspection was conducted at Swansea Baling Plant EPR/QB3032RW by Sally Wakeford alongside a full

site inspection by Michael Edwards. We were accompanied on site by Chris Fender.

This CAR form regards only the MRF activities and reporting, a separate CAR form will be provided for the full site inspection.

Waste Returns

Prior to the inspection the Q1 2023 Waste returns were reviewed. The number of samples for the glass outputs appeared incorrect, only 34 samples were recorded on the returns for an incoming stream of 2113.52 tonnes of glass output. This would require 42 samples at 10kg per 50 tonnes.

On discussion during the inspection it was identified that this was a reporting mistake, as 52 samples had actually been taken during this period.

The number of samples for each waste stream is more than required. For example, for the inputs 2142.92 tonnes of incoming waste had 26 samples actually taken and 18 reported.

There appeared to be some discrepancies on reading the waste returns, with more waste being exported than imported under the comingled collection. This was discussed during the visit, and a spreadsheet showing the relevant data produced.

The spreadsheet of incoming and outgoing data provided for 2022-2023 financial year shows that the output data also includes collections from bottle banks, household waste recycling centres, and trade glass.

In addition, the council fly tipping and cleansing crews when emptying town centre bins keep the recyclates separate. These would be weighed and recorded as general waste or recyclates over the weighbridge, and then offload into the relevant designated areas for the outgoing wastes. This will provide some discrepancies for the incoming vs the outgoing volumes. This activity from the crews, whilst making the returns more difficult to read on face value, means that the incoming wastes are handled appropriately and increasing recycling rates.

It is also noted that during the last quarter the yard was emptied of recycling for end of year recycling targets.

Incoming waste code

It is noted in your returns that the incoming mixed waste code is 20 01 02 (municipal glass waste) – described as comingled collected mixed glass cans packaging. This was discussed during the inspection, Chris explained that this incoming waste code had already been discussed and would be changing from 01 July 2023 to 20 03 01 mixed municipal waste, with the description on the returns staying the same as comingled collected mixed glass cans packaging. The delay in the change was due to completion of returns, and making it simpler for weighbridge staff and ensuring the data was correct at the start of a new quarter.

MRF Operation

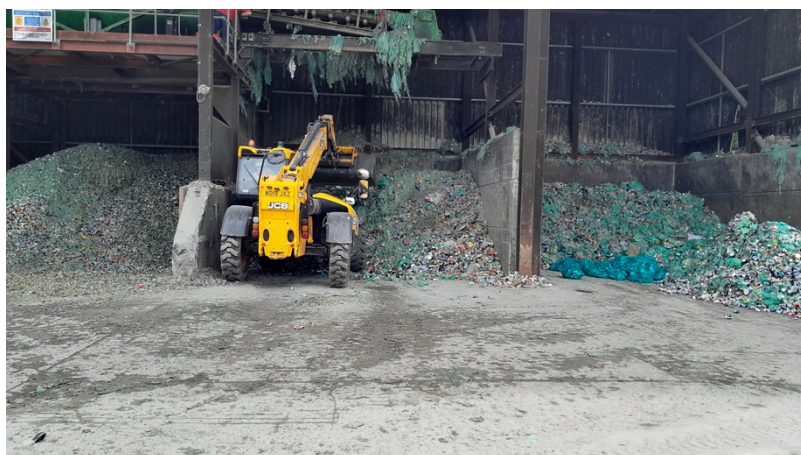
During the site inspection the MRF was seen in operation. After the glass waste is removed through the trommel, the remaining contamination is pulled by hand before the steel and

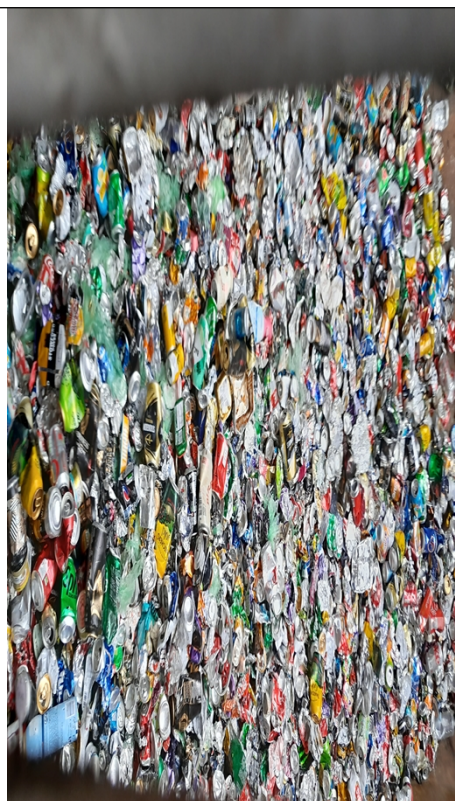
aluminium are separated using eddy currents.

The operatives undertaking this work appeared to be clearing most contaminants from the waste and separating into a bin. This bin, although the majority of it during this inspection was green plastic bags, did contain other waste which had been pulled off the line, the hand picking targeted all non-can wastes.

One of the bins containing large amounts of contaminants was due to be re-run through the plant again.

The outgoing bins of steel and aluminium cans and the baled cans appeared clean and relatively free of contamination.





Thank you for taking the time to accompany me around the site.

END

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

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

You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.