

Compliance Assessment Report CAR_NRW0043051

Permit being assessed: DB3090FA.

For: ReCover Blaenavon Ltd, held by ReCover Blaenavon Limited

At: ReCover Blaenavon Ltd, Kays and Kears Industrial Estate, Blaenavon, Torfaen, NP4 9AZ.

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

On 18/12/2023 between 11:00 and 11:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Jodie Baskerville.

Report sent to: Mr. Jonathan Pallas, Managing Director on 21/12/2023.

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)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F5 - Amenity - Deposits on road	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 18th December 2023 to ReCover Blaenavon Ltd, permit reference number EPR/DB3090FA. Natural Resources Wales (NRW) Officer Greg GARDNER and Senior Waste Regulation Officer Jodie BASKERVILLE attended the ReCover Blaenavon Ltd site at the Kays & Kears Industrial Estate, Blaenavon, Pontypool, NP4 9AZ for an unannounced first site inspection at 11:00am where we met Office Manager Ms. Elizabeth ABRAHAM. The weather was wet and reasonably cold.

FIRST SITE INSPECTION

The purpose of this site visit was for NRW regulatory officers to undertake a first site inspection of the newly permitted waste operation where certain topics were to be discussed with the operator.

The topics intended to be discussed as part of the initial site inspection in further detail included:

- How to comply with your environmental permit
- Purpose of an Environmental Management System (EMS)
- Technical competence such as obtaining a WAMITAB certificate
- Frequency and details of waste return submissions
- How compliance scoring affects subsistence fees
- What documents are held on the public register
- The site / operators waste duty of care
- Hazardous waste requirements
- Site infrastructure and maintenance requirements
- Purpose of a Fire Prevention & Mitigation Plan (FPMP)

As the visit was un-announced, key ReCover personnel were not present to discuss the above topics. In addition to this, there were on site issues regarding telecommunications, and so it was deemed necessary to postpone the initial first site inspection discussion and instead undertake a normal routine inspection. NRW Officers will return in the early part of 2024 to complete the initial first site inspection checklist with the operator.

A telephone conversation was held with the Managing Director, Mr. Jonathan PALLAS during and post site inspection to discuss the sites operations, require further documentation in relation to the permit and to discuss findings following the site inspection.

GENERAL OBSERVATIONS

Ms. ABRAHAM escorted NRW Officers around the site where stockpiles of plastic waste(s) were located within designated bays with sufficient fire breaks between them as well as stockpile heights that were in compliance with the sites Fire Prevention & Mitigation Plan (FPMP) - see photos 1 & 2. There were no offensive odours witnessed by NRW Officers during the site inspection. Whilst housekeeping standards on site were satisfactory, it is worth noting to the operator to ensure good housekeeping standards are maintained at all times to prevent / mitigate and environmental impact.



Photo 1 - Plastic waste(s) stored in compliance with the sites FPMP document



Photo 2 - Plastic waste(s) stored in compliance with the sites FPMP document

NRW Officers were escorted to the rear of the site where a noise barrier had been recently installed to mitigate excessive noise. This is a pre-operational requirement under the sites environmental permit (section 2.5) - See photos 3 & 4. There were no offensive noises witnessed by NRW Officers during the site inspection.



Photo 3 - Recently installed noise barrier to mitigate excess noise



Photo 4 - Recently installed noise barrier to mitigate excess noise

NRW Officers Greg GARDNER & Jodie BASKERVILLE left site at 11.30am the same day.

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