

Compliance Assessment Report CAR_NRW0043433

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 31/01/2024 between 11:00 and 11:30.

Parts of permit assessed: Various

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

Report sent to: Mr. Sean Finnermore, Technically Competent Manager on 15/02/2024.

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)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	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 31st January 2024 to Berry Global, Rhymney, Permit number EPR-UB3897TG.

Natural Resources Wales (NRW) Waste Regulation Officer Greg GARDNER and Senior Waste Regulation Officer Jodie BASKERVILLE attended the Berry Global Site at Block 3 Maerdy Industrial Estate, Rhymney, Tredegar, NP22 5PY for an unannounced site inspection at 11:00am where we met Mr. Sean FINNEMORE, Safety, Health, Environment and Quality manager for the site. The weather was slightly wet, and reasonably mild which it had also been the previous day.

PERMIT BREACHES / ACTIONS

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

GENERAL OBSERVATIONS

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 with no concerns identified. 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 a 1 metre high netting located along the inside perimeter of the security fencing to prevent any debris from leaving site (see 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. The security fencing was in good working order with no concerns identified.

It was also noted that the concrete impermeable flooring was in good condition with no concerns identified (see photo 4). 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.



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



Photo 2 - Stockpiles of waste plastic(s) stored safely



Photo 3 - Netting around perimeter of site preventing litter escaping site



Photo 4 - Site drainage in good working condition during site inspection

WASTE ACTIVITIES - WASTE POLYTHENE TREATMENT

Mr. FINNEMORE escorted NRW Officers around site. During this inspection the site was operational. 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). The housekeeping within the enclosed buildings was in very good condition with no loose debris located within the production facility (see photo 6).



Photo 5 - Secondary containment bund for liquid storage



Photo 6 - Good housekeeping standards at Berry Global, Rhymney

The site have put in preparations for the new Workplace Recycling Regulations that are coming into force, in Wales, on 6th April 2024. Following this site inspection, a site visit between NRW and Berry Global is planned for March 2024 to discuss these regulations to provide advice and guidance on what current and additional measures can introduced to ensure the site fully complies with these regulations.

Further information on the Workplace Recycling Regulation can be found on the below link:

Link > [Workplace recycling | GOV.WALES](#)

WASTE ACTIVITIES - NOISE

Berry Global have historically had complaints arise regarding noise emissions from their site due to their on site processes / equipment. During this site inspection an AHU (Air Handling Unit) was assisting in the mitigation of noise (see top of 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 7).



Photo 7 - Air Handling Unit (AHU) installed to mitigate excess noise emissions

WAMITAB QUALIFICATION

Mr. Jason CAVENDER has been identified as such and Mr. CAVENDERS WAMITAB certificates have been submitted to NRW for our records. The expiry date for Mr. CAVENDERS continuing competency is 08/06/24.

WASTE RETURN SUBMISSIONS

Berry Global, Rhymney have submitted their waste return data for permit, EPR-UB3897TG, on time and in full. Please see table below for waste(s) received and removed from site for 2023.

2023 - Total Waste(s) Received / Removed

	Waste(s) Received (Tonnes)	Waste(s) Removed (Tonnes)
Quarter 1	2,436.20	483.91
Quarter 2	1,437.71	411.75
Quarter 3	744.42	447.41
Quarter 4	1,260.98	377.25
Total	5,879.31	1,720.32

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).

Just as a reminder to the site of the quarterly waste return submission deadlines (table below).

Waste Return Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

NRW Officers Greg GARDNER and 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

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.