

## Compliance Assessment Report CAR\_NRW0045628

**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:** Site Inspection,

**Reason:** Routine.

**On:** 05/11/2024 between 12:30 and 13:30.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Greg Gardner, accompanied by Chris Burge, Mark O’Gorman.

**Report sent to:** Mr. Craig Weaver, Site Manager, on 14/11/2024.

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

| Part of permitted activity assessed (compliance criteria)                | Assessment result | Permit condition |
|--|-------------------|------------------|
| W1A - Waste - Management - General management                            | Action only (X)   |                  |
| W2A - Waste - Operations - Permitted activities                          | Assessed (A)      |                  |
| W2C - Waste - Operations - Operating techniques                          | Assessed (A)      |                  |
| W2D - Waste - Operations - The site                                      | Assessed (A)      |                  |
| W3A - Waste - Emissions and monitoring - Emissions to water, air or land | Assessed (A)      |                  |
| W3C - Waste - Emissions and monitoring - Odour                           | Assessed (A)      |                  |
| W3D - Waste - Emissions and monitoring - Noise and vibration             | Assessed (A)      |                  |
| W3G - Waste - Emissions and monitoring - Fire                            | Assessed (A)      |                  |

Result types are explained in more detail in the ‘Important Information’ section below.

| Total 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?

| Criteria | Action needed  | Complete by |
|----------|--|-------------|
| W1A      | Following fire incident on 22/08/24, review and update FPMP and other relevant site procedures and send to NRW for review. | 31/12/2024  |

Compliance 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 report details the site visit made on the 5th November 2024 to ReCover Blaenavon Ltd, permit reference number EPR/DB3090FA. Natural Resources Wales (NRW) Officer Greg GARDNER, Chris BURGE and Enforcement Apprentice Mark O'GORMAN attended the ReCover Blaenavon Ltd site at the Kays & Kears Industrial Estate, Blaenavon, Pontypool, NP4 9AZ for an unannounced site inspection at 12:30pm where we met with the Site Manager. The weather was foggy and reasonably cold.

### GENERAL OBSERVATIONS

The site manager 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.

Housekeeping standards on site were satisfactory - see photo 3. There was some loose debris located around site however this was not excessive and not causing any pollution. The site manager indicated that the area is checked before / during / after the shift to clean up any excess debris.

Whilst there is an expectation to generate debris from on site operations, it is worth noting to the operator to ensure good housekeeping standards are maintained at all times to prevent / mitigate and environmental impact such as a water pollution.

On 22nd August 2024, ReCover Blaenavon encountered a small fire at their site which required Fire and Rescue Service (FRS) attendance. The fire was extinguished quickly with no impact to the environment or building. From further investigation from on site staff indicated that hot plastic waste material that had been processed on site and was no longer required, was placed in a box with some loose bits of paper where it subsequently caught

fire.

The location of the fire was isolated and extinguished quickly. The site, as a consequence of the fire, are reviewing the FPMP and other relevant site procedures and will be updated accordingly.



**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



**Photo 3** - 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 4. There were no offensive noises witnessed by NRW Officers during the site inspection. The yard at the rear (see photo 5) contained various waste streams, such as packaging, which were stored in compliance with the site FPMP (fire breaks / under 4 metres). Housekeeping at this area of the site was good.



**Photo 4** - Recently installed noise barrier to mitigate excess noise



**Photo 5** - Waste(s) stored to rear of the building

### **PERMIT SURRENDER**

During the site inspection, discussion took place regarding surrendering of the sites permit. If this is required then the site would have to be completely cleared and a site condition report submitted to NRW which would indicate that there was no contamination remaining prior to the surrendering. A final site inspection would be undertaken to determine if the site had been appropriately remediated. Details of a full and partial surrender of the permit can be found on the attached link - [Natural Resources Wales / Apply to surrender \(give up\) all or part of a waste permit](#)

NRW Officers left site at 13.30pm the same day.

If you have any issues with this report please contact Greg Gardner on [greg.gardner@naturalresourceswales.gov.uk](mailto: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.

**If your assessment result in Section 1 is suspended, what does this mean?**

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 Waste compliance criteria (used in section 1 and 2):**

**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

**2. Operations**

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

**3. Emission and Monitoring**

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

**4. Information**

- W4A – Records
- W4B – Reporting
- W4C – Notification

**Enforcement response**

Any non-compliance with a permit condition 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 twenty 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 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto: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](mailto: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.