

Compliance Assessment Report

Report ID:
CAR_NRW0034260

This form will report compliance with your permit as determined by an NRW officer

Site	A J Recycling Ltd	Permit Ref	JP3998FN			
Operator/Permit holder	A J Recycling Ltd					
Regime	Waste Operations					
Date of assessment	14/11/2018	Time in	11:30	Out	12:15	
Assessment type	Audit					
Parts of the permit assessed	MRF Requirements					
Lead officer's name	Wakeford, Sally					
Accompanied by	Ellar, David					
Recipient's name/position	Sonia Jenkins/ Site Manager	Date issued	22/11/2018			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

On 14 November 2018 an inspection was undertaken by Sally Wakeford and David Ellar. This was a routine inspection for both Permit and Materials Recycling Facility Regulations compliance. We were accompanied around site by Sonia Jenkins.

You will receive 2 CAR forms for this inspection and this CAR form will focus on the MRF compliance.

Whilst on site we discussed the change in Operations on site. The site will be receiving all orange bag waste from Pembrokeshire County Council, and as such operations must change to be able to get through all the waste in a timely manner.

As such you will be only separating the steel, large cardboard/paper and plastic wrap from the waste, leaving a co-mingled output. This co-mingled output will contain paper, plastic, card and aluminium, which will be sent to another waste transfer station for separation. We discussed whether or not sampling would be required under the regulations. As it is still co-mingled, sampling of this output would not be required as the sampling following further sorting would be done at the onward transfer station.

Occasionally some of the inputs, they will be put over the eddy current for removing the aluminium, so we may occasionally see sampling for aluminium in the waste returns.

On viewing the baled output wastes, it was observed that they are consistent with the sampling results from previous waste returns.

We discussed previous issues with the waste returns, with the high standard deviations. This occurred due to the different numbers of samples taken across the 3 months in the quarter and has been rectified by only obtaining standard deviation for all samples at quarter end.

Thank you to Jen for showing us how you undertake sampling. Sampling was undertaken in line with the regulations.

It had been questioned about the requirements for a screen to separate out the material particles from the bulky waste prior to weighing. The regulations DO NOT state a screen is required. The only part of the regulations mentioning materials particles for input sampling states:

(7) If the sample taken under sub-paragraph (2) contains material particles, they are deemed to comprise the proportions of target materials, non-target materials and non-recyclable materials already identified as making up the other contents of that sample, and the weight of the material particles must be apportioned according to those proportions for that particular sample.

"material particles" means—

- (a) for specified output material that is made up in largest proportion of glass material, particles of that material that measure less than 13 millimetres along their longest dimension, and
- b) in relation to all other types of specified output material and for mixed waste material, particles of material measuring less than 55 millimetres along their longest dimension;

Thank you for taking the time to show us around the site and explain the changes to operations.



Input stock:



Output co-mingled stock:



A large pile of white plastic bottles and other plastic waste, illustrating the volume of plastic waste generated. The pile is composed of numerous discarded plastic bottles, some with labels, and other plastic debris, all stacked together in a large, unorganized heap. The background shows a dark, industrial setting with blue structural elements.

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EPR Compliance Assessment Report

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Operator/Permit holder	A J Recycling Ltd	Date	14/11/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.