

Compliance Assessment Report CAR_NRW0045982

Permit being assessed: DB3797TC.

For: Cwmbran Glass Recovery Facility, held by Recresco Limited

At: Unit 60, Springvale Ind Est, Cwmbran, NP44 5BE.

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

On 08/01/2025 between 10:15 and 11:15.

Parts of permit assessed: various

NRW Lead Officer: Carla Curtis, accompanied by Greg Gardner, Alexandra Tennant.

Report sent to: Kevin Edwards, Depot Manager on 22/01/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W2A - Waste - Operations - Permitted activities	C3 Minor	2.3.1 (a)
W1A - Waste - Management - General management	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3E - Waste - Emissions and monitoring - Monitoring	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4B - Waste - Information - Reporting	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
1	4

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
W2A	Please ensure that the waste(s) stored outside is moved within the building and is processed as soon as reasonably practical as per permit conditions and your Environment	28/02/2025

Criteria	Action needed	Complete by
	Management System (EMS).	

Action 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 8 January 2025 to Recresco Limited, permit reference number EPR-DB3797TC.

Natural Resources Wales (NRW) Officers Carla CURTIS, Greg GARDNER and Alex TENNANT attended site at 10:15 to conduct an unannounced routine inspection. They were met by Mr. Kevin EDWARDS (Depot Manager) who accompanied officers around the site. Weather conditions were cold and overcast at the time of inspection.

The following observations were made during the site visit.

The site was fully operational at the time of the inspection. The processing of glass is undertaken inside the building before being sorted and stockpiled by colour ready for further processing. The maximum storage of waste(s) as per permit conditions, before processing, is 500 tonnes, The finished product is then stored outside – see photo 1

During the site inspection, NRW Officers noted that there was some glass waste(s) stored outside in segregated bays awaiting processing. It was explained by the Depot Manager at the time that this was not the normal procedure however due to the recent busy operational period (Christmas), that the waste(s) were stored outside temporarily due to the amount received at this time and would be processed as soon as reasonably practical. As a reminder to the operator, as per permit condition 2.3.1a and 1.3 of your Environment Management System (EMS), please ensure all waste(s) are stored inside / under a canopy at all times.

CATEGORY 3 BREACH – PERMIT CONDITION 2.3.1

2.3.1 (a) Which details the technique and manner described in the documentation specified in schedule 1, table S1.1

Table S1.1 Activities

	Description of activities for waste operations	Limits of activities
	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment of wastes listed in Table S1.2 consisting only of:
	R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)-	<ul style="list-style-type: none"> • grading • separating • air drying • crushing • density separation • optical sorting • mechanical separation of waste into different components for the purpose of recovery or disposal.
	R4: Recycling/reclamation of metals and metal compounds	
	R5: Recycling/reclamation of other inorganic materials	All treatment activities shall take place within a building on an impermeable surface with a sealed drainagesystem.
	D14: Repackaging prior to submission to any of the operations numbered D01 to D13	Incoming waste shall be stored within a external storage bay under a canopy on site for a maximum of two weeks.
	D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced).	Only wastes consisting of inert material from glass processing may be stored outside of the building.
		Waste types specified in Schedule 2 Table S2.1.
		Wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> - Consisting solely or mainly of dusts, powders or loose fibres - Wastes that are in a form which is either sludge or liquid - Wastes consisting of or contaminated with Japanese Knotweed - Wastes consisting of or contaminated with materials or substances which may pollute surface and/or groundwater and land.

As stated in section 1.3 of The Environment Management System: *All incoming waste will be stored within a building or under the external canopy and be processed within a maximum period of four weeks.*

Please ensure that the waste(s) stored outside is moved within the building and is processed as soon as reasonably practical as per permit conditions and your Environment Management System (EMS).



Photo 1 – Showing waste temporarily stored outside



Photo 2 - showing product stored outside

WASTE ACTIVITIES

All the waste and product storage bays were all clearly labelled with waste(s) and product stored within them were not overlapping and / or causing a potential pollution – see photo 2.

DRAINAGE SYSTEM

The drainage is working efficiently and is regularly maintained with no issues identified during the inspection

SITE INFRASTRUCTURE

The flooring on site was in good condition with no apparent damage visible. General housekeeping on site was maintained to a good standard and no causes for concern were identified. There was no excessive noise along with no offensive odours witnessed by NRW Officers especially in or around the dryer section of the site. The site have installed a new gas pipeline system which will be an alternative fuel source for the dryer system as opposed to the current source which is diesel. The full installation of this system is expected in due course and the site will notify NRW when it is fully commissioned – see photo 3.

TECHNICAL COMPETENCY

The site TCM is Mr. John MADDOX their certificate expires on 25 November 2026.



Photo

3 – showing finished fines and reject fines within the bays



Photo 4 – Showing the new gas pipe that has been installed ready to heat the dryer

ODOUR MONITORING

Following the site visit, NRW Officers undertook some odour monitoring at two separate locations within the nearby residential area from which odour reports have previously been recorded. Whilst at these locations, NRW Officers witnessed no offensive odours that could be attributed to activities undertaken at the Recresco site.

INCIDENT RESPONSE - ODOUR

NRW officers continue to respond to incident reports relating to odours from the permitted facility. It has been noted that the operator continues to proactively update NRW regarding either ongoing and / or upcoming activities taking place as part of the permitted and wider site activities which may give rise to odour. Please continue to log and, where appropriate, respond to incident reports sent by the NRW Incident Communication Centre (ICC) and / or local regulatory officer as part of the standard notification procedure.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Carla CURTIS via email at Carla.curtis@naturalresourceswales.gov.uk

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.