

Compliance Assessment Report CAR_NRW0038818

Permit being assessed: AP3199FE.

For: Bryn Pica Waste Operations, held by Cynon Valley Waste Disposal Company Ltd

At: Bryn Pica Waste Operations, Llwydcoed, Aberdare, R C T, CF44 0BX.

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

On 09/09/2021 between 10:30 and 12:30.

Parts of permit assessed: Materials recycling facility and mattress recycling facility

NRW Lead Officer: Laoni Tye, accompanied by Gillian Coates, Elysia Lovelock.

Report sent to: Lee Foulkes and Ian McAlister, Technical manager and TCM on 13/10/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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

I, senior officer Laoni Tye attended site for an unannounced visit with officers Gillian Coates and Elysia Lovelock. The purpose of the visit was to introduce myself as the new regulatory officer and learn about the site processes. We met with Lee Foulkes (Technical manager) who we thank for showing us around. Ian McAlister (TCM) was not on site at the time. Only the Materials Recycling Facility (MRF) and mattress processing facility were inspected due to time constraints, the remaining site activities will be visited on a separate visit. The weather was dry. There were no breaches recorded.

Materials Recycling Facility

Mixed dry recyclables are deposited inside the reception bay within a building, any large bulky items are removed. The waste is then fed into a large hopper, where it goes through a 'bag splitting' phase before going through the ballistic separator. The separator takes out film and plastic, finer fibres of less than 50mm such as shredded paper and glass fines. 2D material is then taken out (paper and cardboard) any 3D material such as plastic and metal then goes to a separate section of the process. There are picking lines towards the end of each line to further clean up any contamination. The MRF can also identify and separate black and brown plastics.

The MRF has cameras throughout the process which are monitored in the control room. This ensures contamination can be identified at an early stage to reduce risks. We thank the operatives for taking the time to show us this during the visit. It can process approximately 23 tonnes per hour but runs at 70% capacity therefore processing approximately 15 tonnes per hour.

We viewed the outputs which are baled with paper and cardboard being stored within a building, the other baled materials are stored outside. The plastics remain mixed as these are processed further at the receiver site. There was minimal contamination in the baled metals and paper/cardboard. There were bales of residual type waste which we were advised get sent for incineration.

Mattress recycling facility

We did not enter this building due to the risk of particulates (the site personnel wear full head face masks) but we were talked through it whilst viewing from outside. Mattresses are brought in from local authority civic amenity sites mainly, the process then splits the mattresses, separating out the fabric and metal. Any foam or heavily soiled mattresses are rejected prior to entering the process. Fabric is baled and sent for further processing, the fabric of which is often recycled for use in carpet underlay. The site process approximately 200 mattresses per day.

Waste sampling – MF Regulations

We have reviewed your waste return submissions and have the following advice and guidance to provide to you which we hope will assist in future sampling and submissions to NRW.

The waste returns show sampling substantially less inputs in 2020 than are required to sample each quarter by number & weight with the exception of July-Sept 2020 quarter. Please see image below which shows this, the green is Q2.

Should
be 1
sample
every 125
tonnes

Input	Actual	Difference
72	42	-30
65	65	0
64	35	-29
71	58	-13

The waste returns show sampling substantially less specified plastic outputs in 2020 than the minimum required by number & weight.

Should be 1 sample per 15 tonnes specified plastic output	Actual	Difference
7	11	4
11	2	-9
0	9	9
21	7	-14
39	34	-5
1	11	10
34	11	-23
40	31	-9
14	9	-5
40	23	-17
2	7	5
1	11	10
210	166	-44
4194	3391.5	-802.5

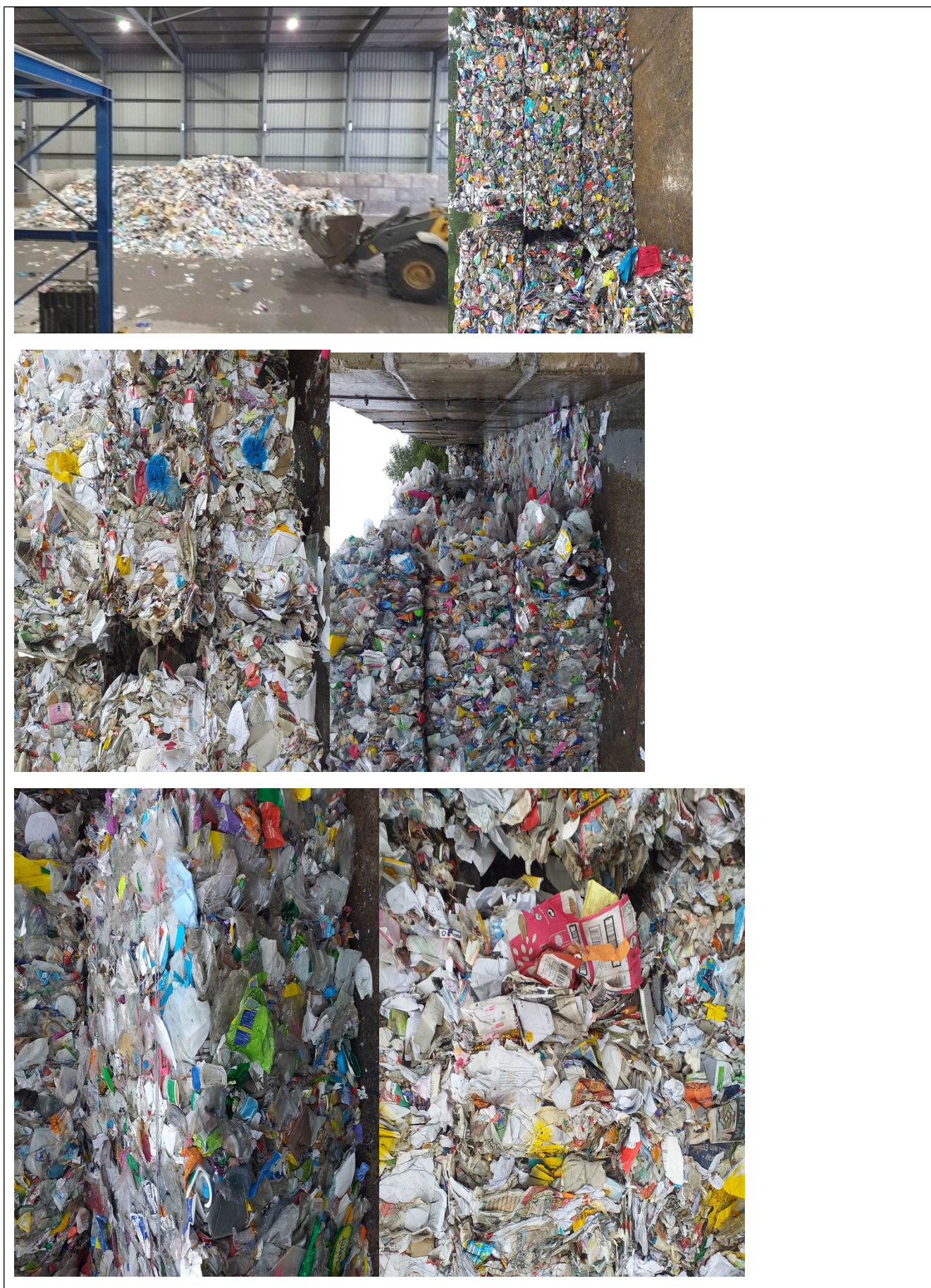
However, the operator reported sampling substantially more paper & metals than the minimum requirement in legislation (176 samples were required and 432 were reported). 1 sample per 60 tonnes are required.

Please see the WRAP website for further advice and guidance on the sampling requirements: [The Materials Recovery Facilities \(MRFs\) Sorting Guide | WRAP](#)

Lastly, the operator did not report sampling any glass specified outputs removed from the mixed inputs (glass is in the mixed input sampling results).

Action: Can you please advise NRW any reason for this and update any procedures as appropriate.

Photographs



Please let your officer know if you have any questions.

Many thanks

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.