

Compliance Assessment Report CAR_NRW0038875

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 19/10/2021 between 14:30 and 15:15.

Parts of permit assessed: Various

NRW Lead Officer: Jonathan Lee, accompanied by Greg Gardner.

Report sent to: Steven Harris, Business Improvement Manager on 29/10/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
F2 - Amenity - Noise	Action only (X)	

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?

Criteria	Action needed	Complete by
C2	BPI, Rhymney to send latest Noise and Vibration Management Plan and Environmental Management System to NRW as well as previously conducted noise assessment reports	Already completed
F2	Ensure, as discussed, roller shutter doors are closed during non-operational hours and / or during operating times where they are not in use to reduce noise impact	Already completed

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 19 October 2021 to British Polythene Limited, Permit number EPR-UB3897TG.

Officers Jonathan LEE and Greg GARDNER attended the British Polythene Limited Site at Block 3 Maerdy Industrial Estate, Rhymney, Tredegar, NP22 5PY for an unannounced routine site inspection accompanied by Lee Anthony CARPENTER, Environmental Health Officer from Caerphilly County Borough Council (CCBC). We arrived at 14:30pm where we met with Mr. Steven HARRIS (Business Improvement Manager). The weather was raining but mild through the site visit.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact or effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

PERMIT HISTORY

See extract from EPR-UB3897TG regarding permit history.

Status log of the permit

Description	Date	Comments
Application EPR/UB3897TG/A0001	Duly made 24/04/13	Application for non-hazardous physical treatment facility - polythene recycling.
Response to Schedule 5 notice	13/05/13	Site drainage description, amended environment management system and site specific risk assessment.
Additional information received	18/06/13	Site drainage description, amended drainage plan, discharge consent and specifications of interceptor.
Permit determined	04/10/13	Permit issued to British Polythene Limited

GENERAL OBSERVATIONS

British Polythene Limited operate under a bespoke environmental permit. This permit is for a non-hazardous physical treatment facility which recycles waste polythene 24 hours a day, 7 days a week. Treatment operations shall be limited to washing, shredding, pelletising, bailing and heating of polythene waste for the purposes of recovery only. The maximum

quantity of waste accepted and processed on site shall not exceed 30,000 tonnes per year. The site was in operation at the time of the visit and there was no waste of any type stored outside of the permit boundary.

SITE INFRASTRUCTURE

The general housekeeping on the site was in good condition with no major amounts of loose debris located on the floor (as seen in photo 1). It was also noted that the concrete impermeable flooring was generally in good condition.



Photo 1 - Outside yard of BPI factory kept in good housekeeping condition

WASTE ACTIVITIES - WASTE POLYTHENE TREATMENT

The purpose of the unannounced site visit was following a noise complaint from a local resident. NRW Officers, with accompaniment from CCBC Environmental Health Officer, attended site and met Mr. Steven HARRIS where during the site tour there was evidence of increased noise levels. Mr. HARRIS indicated that there has been no change to the normal treatment process and current noise levels are not abnormal. During the site visit, the roller shutter access doors were open to allow on site traffic to transport goods and services. Mr. HARRIS agreed to close these doors where the noise levels reduced marginally. NRW Officers requested the latest version of the sites Noise and Vibration Management plan, Environmental Management System and previous Noise Assessment Reports which have been submitted to NRW on 20/10/21 for review. Feedback to the operator, once these documents have been reviewed, will be provided in due course.

ACTION: BPI, Rhymney to send latest Noise and Vibration Management Plan and Environmental Management System to NRW as well as previously conducted noise assessment reports

COMPLETE: BPI, Rhymney have submitted the required documents to NRW on 20/10/21

ACTION: Ensure, as discussed, roller shutter doors are closed during non-operational hours and / or during operating times where they are not in use to reduce noise impact

COMPLETE: Confirmation via email from Mr. Steven HARRIS that the Roller Doors are to be kept closed during the night-time as well as conducting a condition survey across the sites

extrusion hall to determine if any offending items can be identified.

WASTE RETURN SUBMISSIONS

British Polythene Limited, Rhymney have submitted their waste return data for permit, EPR-UB3897TG, on time and in full. To date (2021), the site has received 5,858.07 tonnes of waste(s) and removed 949.26 tonnes of waste(s). 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 on site (30,000 tonnes).

Officers Jonathan LEE and Greg GARDNER left site at 15.30pm 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 in 2021.

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.