

Compliance Assessment Report

Report ID:
CAR_NRW0033386

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

Site	Gelling Fibre Plant EA/EPR/NP3433BC/V003	Permit Ref	NP3433BC			
Operator/Permit holder	Convatec Ltd					
Regime	Installations					
Date of assessment	01/05/2018	Time in	10:30	Out	12:00	
Assessment type	Audit					
Parts of the permit assessed	VOC Abatement					
Lead officer's name	Griffiths, David					
Accompanied by						
Recipient's name/position	Trevor Roberts/ Engineering Manager	Date issued	22/05/2018			

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

Further to our meeting on the 1st May 2018 - This CAR form is confirming the action and notes taken by yourselves during this meeting. (Jeff Deal - Programme Manager and Trevor Roberts - Engineering Manager)

Permit variation has now been submitted and duly made. Based on our current planned schedule, Convatec's intention would be to make the changeover to the new plant at the start of October this year. This therefore provides a window of at least 4 months for determination.

During our meeting we discussed the subject of meeting ongoing reporting obligations while Kevin is away from work and Trevor Roberts has confirmed that he will co-ordinate in Kevin's absence and ensure that Convatec's statutory obligations continue to be fulfilled.

We discussed the issue of the current FID station for monitoring VOC's from the existing bioscrubber and how the new abatement system construction works will impact on the units current location and operability while the new systems are installed. We've agreed the following approach in order to maintain the quarterly reporting schedule;

1. Q1 2018 reporting: This should now have been submitted but please advise if this isn't the case - **Email subsequently sent to Trevor Roberts confirming monitoring reporting requirements by NRW.**
2. For Q2 we will be able to prepare data to submit as per the current reporting schedule obligations.
3. The FID system will need to be removed during the construction phase and the adjacent area around the existing bioscrubber will be heavily impacted by construction works. We have agreed in principle that prior to the planned removal of the FID unit (currently forecast around mid June), Convatec will obtain a data set and utilise these readings to support our Q3 submission and this negates the challenge of trying to find a suitable alternative location to reinstate the FID unit.
4. As we plan to start the plant in early October and anticipate full commissioning to have been completed before end October, we currently plan to take extractive readings from the new installation in Q4 as part of the commissioning & start-up phase and these would then form the basis of our Q4 submission.

NRW acknowledges the new investment by Convatec which will significantly reduce your environmental impact, and we agree the way forward during this construction phase as you have noted above in the report.

*****end of report*****

EPR Compliance Assessment Report

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Operator/Permit holder	Convatec Ltd	Date	01/05/2018

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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.