Compliance Assessment Report

Report ID: CAR_NRW0034292

This form will report compliance with your permit as determined by an NRW officer					
Site	Olleco Cymru Wales	Permit Ref	BP3296EF		
Operator/Permit holder	Olleco Cymru Wales				
Regime	Waste Operations				
Date of assessment	15/11/2018	Time in	09:00	Out	17:00
Assessment type	Audit				
Parts of the permit assessed	various				
Lead officer's name	Malatynski, James				
Accompanied by					
Recipient's name/position	Jason McCann/ Site Manager	Date issued	29/11/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B2 - Infrastructure - Closure and decommissioning	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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

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

Environment Officers James MALATYNSKI, David WARRICK-BROWN and Emma SHARP attended the Olleco site to perform a routine site inspection and met with site manager Jason McCann at 11am who kindly offered to explain and guide us through procedural activities at the Olleco site with the permit BP3296EF. The site was fully operational at the time of inspection with a few members of senior staff away from site.

Conditions of the permit were discussed including:

Permitted Activities

Infrastructure

General Management

Incident Management

Emissions

Amenity

Monitoring

Advice and Guidance

A fork lift truck on site was witnessed crossing the permitted boundary, considering the type of waste on site there is the potential to track oil from the tyres outside of the sealed drainage catchment area. Every effort should be made contain all waste within your permitted area preventing contamination of surface drainage water. Advice and guidance has been issued but if this practice continues then a breach of your permit conditions could be considered.

Action: Please could you ensure that employees are aware of the importance of containing waste within the permitted boundaries, you have significant infrastructure in place to prevent this issue. Utilise free space in the yard, consideration could be given to install a wheel wash system.

General observations

An updated and improved Environment Management System has been implement through the organisation which Jason McCann willing provided an in depth overview. The intention is roll out internal workshops through the organisation to provide EMS training allowing employees to sign off and record that EMS training has been provided. An awareness of the EMS throughout the organisation will benefit its implementation. It's important to note that as it is an organisation EMS there is information included not relevant to the Newport Olleco site such as information that relates to their AD plant.

Action: Please could I request a copy of your updated EMS in order to update our records.

Olleco have 2 exemption in place running in conjunction with their permit. The current exemptions in place are an S1 and an S2.

Jason McCann is the current WAMITAB qualification holder on site and acts as the Technically Competent Management. Jason McCann explained that he is onsite most days and made us aware that 2 employees are currently going through training to receive their WAMTAB qualification and would likely receive their qualification in approximately 3 months.

Action: Please provide evidence of these qualifications once they have been received.

Daily site checks are made each day on site, these include Tank movement data, boiler checks, equipment and maintenance checks.

Jason McCann was able to explain on site procedures coherently and with great detail, it was impressive and appreciated to witness the knowledge displayed. Myself and the colleagues that joined me to perform the routine site inspection learned a great deal.

During the site tour it was immediately impactful that significant works had been completed to clean their sealed drainage. In a previous visit the gullies appeared blocked and weren't effectively capturing waste oils, it was clear that this issue been now been rectified and Jason McCann confirmed that a weekly maintenance and drain clearing regime is operational.

Infrastructure works onsite had been carried out with noticeable infilling of potholes and damaged

impermeable surface had taken place. It's encouraging that these improvements are taking place before an issue is highlighted by a site inspection, I look forward to seeing this active role in improving and maintain the permitted site continue in the future.

An issue indicated by Jason McCann the storage of the barrels on site, as there was no uniform container this made stacking and effective storage of incoming containers difficult. This was partially combated by clustering buckets and barrels together then storing them separately and didn't impact on any permit condition to allow for the effective operation of the site.

Jason McCann showed the melting bath in operation and provided an explanation as to its importance in the process helping remove solidified oil before returning the drums to the oven for further processing. A series of pipes would then draw then draw the oil from the bath for further processing.

Empty drums go through a cleaning process to be re-used within Olleco. Shredders onsite separates oil, plastics and metal using an Archimedes screw. The screw removes the plastic and metal which is passed onto a conveyor to separate metal by magnet and plastic falls into a bulk bag for recycling. Oil falls into hopper and is pumped into holding pit. Metals are skipped ready to be sold as biproduct of the main operation.

A small lab onsite is used to continually test samples monitoring the moisture content as processing allows the moisture content to be reduced form approximately 20% down to 2%, it needs to be 2% to be considered for bio diesel.

We followed Jason McCann to the back of the yard where the importance of the Tricanter was explained. Tricanter is used for three phase separation. Two separate liquid phases (Oil =SG 0.9) + (Water =SG 1) can be separated simultaneously from one solid phase. The different densities of the immiscible liquids and solid means that all three phases can be discharged simultaneously**.** Tricanter works by spinning material at high speed. ****SG=Specific Gravity****

Material extracted after this process is considered calorific value with no moisture which can be used at the AD plant.

The site is currently one of the smaller of the sites and are not looking to increase the amount of waste processed. The processes shown didn't need additional chemicals to assist the processing and the process relies on gravity and heat alone.

A regular cleaning and maintenance regime is in place to allow for the site to process up to 450 tonnes of waste a week.

Waste Returns

Thank you for submitting your waste return on time, please continue this habit. The waste codes all seemed present and correct.

The site is very well managed and maintained with the intention to make operational improvements. Thankyou to Jason McCann for taking the time to show us around the site.

If you have any issues with the report please contact James Malatynski on 0300 065 3394

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0034292**

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Site	Olleco Cymru Wales	Permit Ref	BP3296EF
Operator/Permit holder	Olleco Cymru Wales	Date	15/11/2018

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.

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.