

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

|                              |                                    |             |            |     |       |
|------------------------------|------------------------------------|-------------|------------|-----|-------|
| Site                         | Mekatek Ltd                        | Permit Ref  | BP3098FC   |     |       |
| Operator/Permit holder       | Mekatek Ltd                        |             |            |     |       |
| Regime                       | Waste Operations                   |             |            |     |       |
| Date of assessment           | 28/07/2016                         | Time in     | 10:30      | Out | 12:00 |
| Assessment type              | Audit                              |             |            |     |       |
| Parts of the permit assessed | General Site Inspection - overview |             |            |     |       |
| Lead officer's name          | Wakeford, Sally                    |             |            |     |       |
| Accompanied by               | Ellar, David                       |             |            |     |       |
| Recipient's name/position    | Daniel Lewis / Compliance Manager  | Date issued | 28/09/2016 |     |       |

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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            |                       |
| C2 - General Management - Management system and operating procedures  | A            |                       |
| C4 - General Management - Storage, handling labelling and Segregation | A            |                       |
| D1 - Incident Management - Site security                              | 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.

|                                    |          |   |   |
|------------------------------------|----------|---|---|
| <b>Number of breaches recorded</b> | <b>0</b> | <b>Total compliance score</b><br>(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

The site was inspected on 28 July 2016 by Sally Wakeford and David Ellar, we were also accompanied by Michael Edwards. The site inspection encompassed the activities undertaken by both permits on the site, you will receive 2 CAR forms from this visit for the two separate permitted activities. We met with Barry Couzens and Daniel Lewis.

### **Agenda:**

- Site Inspection
- NRW led variation of the old EAWML 34045 – Update to EPR conditions and remove all the installation activities from the 1999 permit. Review "Residual WML under PPC permit Plan document" - Information required:
  - o EWC codes – Appendix 9 – still relevant?
  - o Annual throughput is needed. To be agreed with the operator
  - o Recovery and disposal codes are needed. To be agreed with the operator
- Condition 1.2 – EMS/Working Plan - Up to date EMS? Latest one we hold is 2006 – has it been reviewed more recently? Review/update will be required if not recently done to ensure reflects operations occurring on site.
- Permits will be required to be inspected separately in future – tracking on our new systems. One visit to both permitted activities will result in 2 CAR forms.
- Site Security/opening hours.

### **NRW Led variation to EAWML 34045. (BP3098FC):**

NRW is looking to review all old permits, prioritising the ones which we are unable to regulate. Your EAWML 34045 permit is on the list of those to be completed first. This will update the permit to EPR condition and remove all the installation activities from the 1999 permit.

I provided you with a copy of a document which appeared to cover the activities which are left following the removal of the installations (PPC) activities. This is titled "Residual WML under PPC Permit plan document".

### **ACTION: Please review this document and provide me with the following information:**

- **EWC codes accepted under this permit – Is Appendix 9 from July 2004 still relevant and up to date?**
- **Annual throughput of just the residual EAWML.**
- **Recovery and Disposal (R&D) codes required.**

You agreed to provide this information the first week of September: 09 September 2016.

Once this is completed, this may make it simpler for you to consolidate the two permits. At present it is not in the scope of the NRW project to consolidate these permits.

### **Environment Management System:**

The current EMS we hold is 2006.

You are currently working towards ISO 14001. The Environment Management System for the two permits are combined into one overarching EMS. Barry Couzens informed me these documents would be sent through on a memory stick.

### **ACTION: Provide your current up to date EMS by 09/09/2016.**

### **Site Security/opening hours:**

The site benefits from CCTV, and a full perimeter fence with electronic gates. The previous manager lives on site.

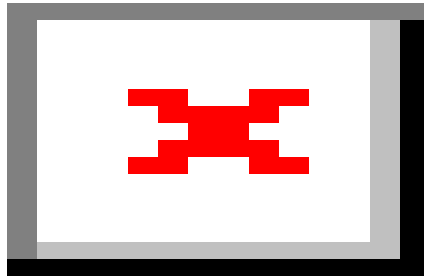
The site opens at 6am for the effluent plant, and offices close at 5pm. There are no current overnight operations although it is in the permit to allow this in certain situations. You currently only open on the weekends if there is a need due to heavy rainfall. There is potentially access from the riverside, however foliage is quite thick, and no incidents have ever happened to date.

### **Site Inspection:**

There are two buildings where the transfer station activities under the EAWML 34045 permit are undertaken. The stock within these buildings is much less, and appears much more manageable, than that of the inspection in November 2015.

Improvements have been made to the electrical system in the transfer station buildings, which in turn have made improvements to

fire safety.



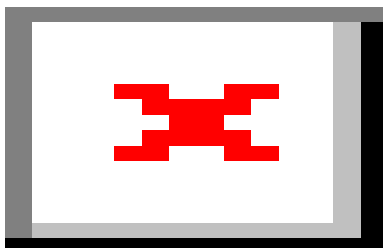
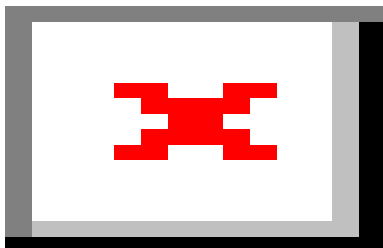
Fire safety is one of the big concerns NRW currently have. NRW, alongside all Welsh Fire Services have produced a document called "Fire Prevention and Mitigation Plan Guidance – Waste" which was sent through to you on the 29 July 2016. This guidance will become part of all permits regulated by NRW going forward.

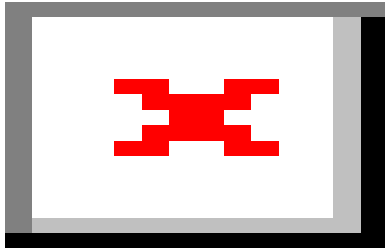
**WEEE:**

WEEE Treatment has mainly moved to your Head Office facility in Rhymney. You informed me the fridges and TVs are shipped out whole, but small appliances are crushed.

Whilst on site, it was noted that small appliances were deposited on the ground, in an area not serviced by sealed drainage or in a building. TVs were being stored whole and uncovered in containers on the new oil treatment area, and electrical items were being shredded in a container outside the building.

Photographs showing WEEE activities being undertaken:





Whilst the permit does not state any specific conditions relating to the storage/treatment of WEEE, it does state activities are to be undertaken in conjunction with sections of your Working Plan (or EMS). The current working plan/EMS we hold is from 2006, and the activities being undertaken do not reflect those stated within it.

On this occasion I will not be scoring you against the relevant criteria as I am awaiting the updated EMS from you. Once this has been submitted I will check that the activities written into the EMS are reflective of those currently being undertaken on site, and review compliance issues at that time, producing a further CAR Form if deemed necessary.

Once the permit is reviewed and modernised, it is likely that the WEEE Directive (2002/96/EC as amended by 2003/108/EC) requirements will be implemented. It is therefore a timely opportunity to review the activities you are undertaking on site to ensure they are fully compliant with the storage and treatment requirements of Annex III of the WEEE Directive and using the Best Available Treatment, Recovery and Recycling Techniques (BATRRT) and treatment of WEEE. Guidance on BATRRT is attached along with this report.

**AOB:**

TFS – Thank you for assisting me in completing the TFS spreadsheet. This information has now been passed to our TFS team.

**Summary of Actions:**

**Deadlines:**

|   |            |
|---|------------|
| Provide information for permit review   | 09/09/2016 |
| Provide your current up to date EMS   | 09/09/2016 |
| Review WEEE activities on site in conjunction with BATRRT and WEEE Directive Annex III                                    | ongoing    |
| Apply for administrative variation to vary head office address – this can then be incorporated into the NRW led variation | asap       |

**Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012.**

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0026302**

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

|                        |             |            |            |
|------------------------|-------------|------------|------------|
| Site                   | Mekatek Ltd | Permit Ref | BP3098FC   |
| Operator/Permit holder | Mekatek Ltd | Date       | 28/07/2016 |

### 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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.