

Compliance Assessment Report

Report ID:
CAR_NRW0022692

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

Site	A J Recycling Ltd	Permit Ref	JP3998FN		
Operator/Permit holder	A J Recycling Ltd				
Regime	Waste Operations				
Date of assessment	21/06/2016	Time in	11:00	Out	12:30
Assessment type	Audit				
Parts of the permit assessed	MRF activities				
Lead officer's name	Wakeford, Sally				
Accompanied by	Ellar, David				
Recipient's name/position	Sonia Jenkins/ Company Secretary	Date issued	15/07/2016		

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	
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

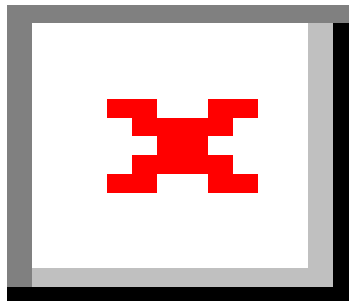
The site was inspected on the 21 June 2016 for the MRF activities, alongside the permit compliance inspection completed by David Ellar and summarised in a separate CAR Form.

You confirmed you had received the letter regarding the increase in sampling rates from October, and we discussed this required an increase in frequency rather than size of sample. Inputs will need to be sampled every 125 tonnes (was 160 tonnes) and the outputs are changing for paper from every 80 tonne to every 60 tonne of output, and plastic is changing from 20 to 15 tonnes of output. Sample sizes remain the same.

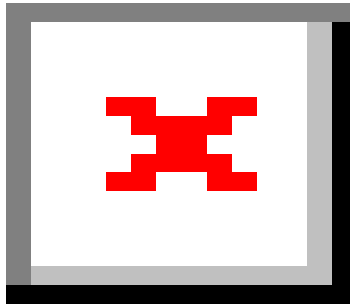
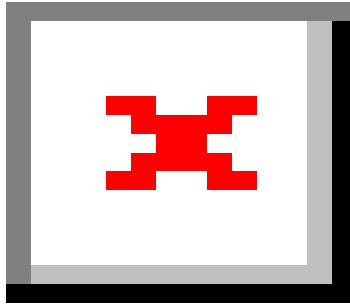
The site accepts waste from council collections in Pembrokeshire, the orange bags are split and the waste piled ready to be put through the picking line. Prior to this there is a pre-sort to ensure that any wastes such as clothes, electronics and glass do not go through the picking line, this in turn increases the recycling rates. Large cardboard is also removed at this point and bagged ready for baling.

The waste piles of input and sorted materials appeared consistent with the sampling data in the waste returns, however we did discuss the 100% rate for the outputs submitted which I will refer to later in this form.

Input of orange bags from Pembrokeshire Council and waste once the bags have been split:



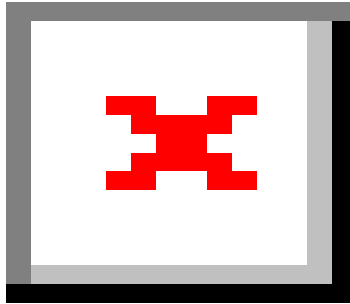
Output wastes:



There were a large amount of bales on site, but these had been delayed in moving due to the containers delay and were arriving later that afternoon.

The paper and cardboard from the City and County of Swansea's green bag collection has been sampled and reported in Q1 2016. This is a single stream of collection and not captured by the MRF Regulations. The four waste streams detailed in the MF Regulations are paper/card, plastic, metal and glass. Is any combination of these four are collected together then these are the inputs and outputs which need sampling and reporting.

Waste paper and card from Swansea Council (not required to be sampled/reported):



You showed me your spreadsheet which informs you when you need to take samples of your inputs and outputs. As the wastes are weighed in on the weighbridge, the figures are entered into the spreadsheet which automatically calculates how many samples are required. This appeared to be working well and will ensure you are reporting the correct number of samples for each relevant input and output.

You act as a haulier for the outputs from the Withyhedge MRF, the wastes are accepted onto your site, and stored prior to removal (occasionally going straight onwards to the destination). These figures are entered onto your waste returns inputs and outputs (see below).

Waste Returns Q1 2016:

Inputs:

You are fulfilling the reporting requirements of the mixed waste inputs.

You have taken samples of the input paper and cardboard packaging. This is not a requirement under the MF Regulations, as this is not classed as a mixed recyclate input.

Outputs:

The returns appear to show under reporting of sampling for the outputs. We discussed this on site, and due to the fact you receive sorted output material from Withyhedge (QP3098FL) this is also being reported on the same line as your outputs from your MRF (for which you have done the correct amount of sampling for the quantity) it is appearing as you not completing enough sampling. This has been done as they are going to the same outlet. If you separate the MRF output from your facility and the Withyhedge waste onto two separate lines, this will ensure we won't expect to see more sampling than is necessary.

All outputs are being reported as 100% target material. You informed me you are rounding this up or down from the one decimal place. Please report all future returns as a decimal such as 99.68% etc.

Example sample sheets:

Thank you for providing me with the samples sheets for February 2016. I have gone through the input sampling spreadsheets and sample sheets and have found no irregularities. I previously went through with you how to calculate the standard deviation for the samples taken across the quarter. And this appears to be still accurate.

The output sample sheets show that there were no other materials within the samples which had been taken which were non-target or non-recyclable (consistent with the waste returns). Please ensure that if there are other recyclates/non-recyclates in the samples they are identified on the sheets and into the waste returns.

Other than the issues highlighted above in the reporting of your sampling, there were no issues or non-compliances identified on site for the MRF activities.

Thank you for taking the time to show us around the site and show me the computer systems/spreadsheets.

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.

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EPR Compliance Assessment Report

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Site	A J Recycling Ltd	Permit Ref	JP3998FN
Operator/Permit holder	A J Recycling Ltd	Date	21/06/2016

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.