

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

Site	Cwmbran Glass Recovery Facility	Permit Ref	DB3797TC		
Operator/Permit holder	Recresco Limited				
Regime	Waste Operations				
Date of assessment	15/01/2019	Time in	11:55	Out	12:30
Assessment type	Audit				
Parts of the permit assessed	C1, C2, F1, F2, G4				
Lead officer's name	James, Ian				
Accompanied by	Tennant, Alexandra				
Recipient's name/position	Kevin Edwards/ Production Manager	Date issued	22/01/2019		

### 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
<p><b>KEY:</b> See Section 5 for breach categories, suspended scores will be indicated as such.  <b>A</b> = Assessed or assessed in part (no evidence of non-compliance), <b>X</b> = Action only,  <b>O</b> = Ongoing non-compliance, not scored.</p>		

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

### Compliance Assessment Report – Recresco Limited – EPR-DB3797TC

#### Introduction

At 1155 on 15<sup>th</sup> January 2019 your site was inspected as part of the routine assessments for compliance, your regulatory officer, Ian James, was in attendance along with officer Alex Tennant. Production Manager Mr Kevin EDWARDS was host and the weather was generally dry although areas of ground were damp from a previous shower.

Your operation consists of a Waste Glass Recovery Facility that produces Glass Cullet under 'End of Waste' Regulation (EU) 1179/2012.

#### Areas of the permit assessed, finding and actions

##### Compliance

C1 – General management; Staff competency/training

##### *Permit Condition 1.1 – General management*

Mr Edwards explained that the previous Technically Competent Manager (TCM) no longer worked for Recresco and that the position was now covered by a staff member who worked between sites and wasn't on site at the date of inspection.

Officer Ian James explained that there were attendance requirements for the TCM and that evidence should be provided of qualification.

**Action**

- 1. Provide contact details for the TCM.**
- 2. Supply evidence of current TCM qualification.**

**Date due: 15<sup>th</sup> February 2019**

C2 – General management; Management systems and operating procedures

*Permit Condition 1.1 – General management*

Evidence of a written management system wasn't sought on the day but will need to be provided.

**Action**

- 1. Supply evidence of a written management system.**

**Date due: 15<sup>th</sup> February 2019**

F1 – Amenity; Odour

*Permit Condition 3.2 – Odour*

No odour at a level likely to cause pollution was observed off site at the time of inspection.

F2 – Amenity; Noise

*Permit Condition 3.3 – Noise*

No excessive noise likely to cause pollution was observed off site at the time of inspection.

G4 – Monitoring and records, maintenance and reporting; Reporting and notification

It was highlighted that the current permit version does not include reference to the requirement to submit 'waste returns' on a quarterly basis. NRW were seeking guidance on this and Mr Edwards was made aware that this condition would likely be added in the future.

After the visit it was confirmed that a NRW led variation was being progressed to add the waste returns condition and both an email and letter were sent to Recresco (addressed to Mr Edwards) on this matter.

Other comments

Thanks for showing us around unannounced. The site appeared well organised with waste materials stored under cover according to the permit conditions. Whilst the initial conveyor to feed the waste into the process was temporarily off-line and being worked on this appeared to be a very recent issue and wasn't causing a backlog of material significant enough to require reporting under permit condition 4.3 'Notifications'. We look forward to hearing from your TCM in due course.

**If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Ian James on 03000 654203 or via email on [ian.james@naturalresourceswales.gov.uk](mailto:ian.james@naturalresourceswales.gov.uk)**

**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.**

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034491**

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

Site	Cwmbran Glass Recovery Facility	Permit Ref	DB3797TC
Operator/Permit holder	Recresco Limited	Date	15/01/2019

### 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.

### 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](mailto: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.