Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: 101558/0248252

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

Site	Tondu Waste Transfer Station			Permit Ref	101558		
Operator/ Permit holder	May Gurney Ltd						
Date	20/08/2015			Time in	10:00	Out	12:00
What parts of the permit were assessed	Materials Facility Operations						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op X	Water Discharge		
Recipient's name/position	Maxine Hopkin						
Officer's name	Eleanor L Davies			Date issued	14/09/2015		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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				Condition(s) breached
a) Permitted activities	**1**. Specified by permit	A		
b) Infrastructure	**1.** Engineering for prevention & control of pollution	N		
	2. Closure & decommissioning	NA		
	3. Site drainage engineering (clean & foul)	N		
	4. Containment of stored materials	N		
	5. Plant and equipment	N		
c) General management	**1**. Staff competency/ training	A		
	2. Management system & operating procedures	A		
	3. Materials acceptance	A		
	4. Storage handling, labelling, segregation	A		
d) Incident management	**1**. Site security	N		
	2. Accident, emergency & incident planning	N		
e) Emissions	**1.** Air	N		
	2. Land & Groundwater	NA		
	3. Surface water	NA		
	4. Sewer	NA		
	5. Waste	NA		
f) Amenity	**1**. Odour	N		
	2. Noise	N		
	3. Dust/fibres/particulates	N		
	4. Pests, birds & scavengers	N		
	5. Deposits on road	N		
g) Monitoring and records, maintenance and reporting	**1**. Monitoring of emissions & environment	NA		
	2. Records of activity, site diary, journal & events	N		
	3. Maintenance records	N		
	4. Reporting & notification	A		
h) Resource efficiency	**1**. Efficient use of raw materials	NA		
	2. Energy	NA		

KEY: **C1, C2, C3, C4** = CCS breach category **(* suspended scores are marked with an asterisk),**
A = Assessed (no evidence of non-compliance), **N** = Not assessed, **NA** = Not Applicable, **O** = Ongoing non-compliance – not scored

Number of breaches recorded	0	**Total compliance score** (see section 5 for scoring scheme)	0

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

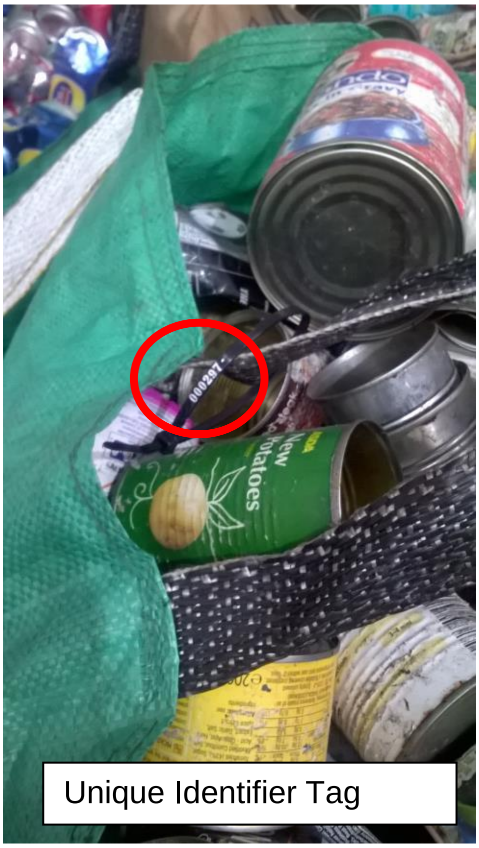
This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

No CCS Scores have been recorded on this Compliance Assessment Report as we are still within the grace period allowing for systems to be set up and errors to be rectified. This grace period will last until end December 2015.

Sampling Procedures

Samples are collected in individual bags which are each tagged with a unique serial number and stored prior to sorting. A temporary sorting area has been set up in one of the buildings. Sorting of the stockpiled samples is carried out on weekends when the system is shutdown in order to avoid any concerns of cross contamination. Results are recorded on a spreadsheet attributed to the unique serial code so when and where it was taken can be identified.

Pre-Sorting Sample Storage



Unique Identifier Tag

While a sample being orted was not observed at the time of this inspections, the process was explained and appears to mirror the requirements of the regulations i.e. adequate weighing facilities, screen mesh sizes etc.

Samples are taken based on a forecast system i.e. knowing the volumes that are likely to come in and ensuring that the appropriate number of samples are taken at the appropriate time.

There is a system in place to overview the sampling to ensure that the correct number of samples is being taken and that the volume of each sample is correct.

All staff dealing with the sampling requirements are provided with appropriate training with signoff sheets maintained to record this.

Reporting of incoming wastes

All incoming waste is being recorded and reported as 20 03 01 'Mixed Municipal Waste' however on the outputs there are lines where the outgoing waste is recorded as separately collected fractions. Following discussion on site it was understood that the majority of recyclate is collected as separate fractions all on 1 vehicle except metals and plastics which are collected comingled. Upon being brought into site the vehicle is being weighed with all the waste in it and reported as mixed, rather than each separately collected fraction being weighed and recorded. It was discussed on site that, as done in Keir sites in England, the weights for the outgoing waste would be reflected as the incoming waste so that the inputs are recorded as separately collected fractions rather than as mixed waste. While this is generally acceptable, please ensure that solutions for this problem are being investigated, and when possible, operations on site are upgraded to allow for the weighing and reporting of separately collected inputs.

Reporting of Target and Non-Target Materials

NRW have taken the position that where the facility has identified the comingled materials they accept / can process e.g. glass and plastic mixtures then any other materials, including those deemed 'target materials' by the MF regulations (in this example metal and paper), should be recorded as non-target where they are recyclable (e.g. Metal and paper) or non-recyclable where they are not (e.g. ceramic).

Sampling of Output Materials

Due to the enclosed nature of the separating system, plastics are not currently being regularly sampled as there is no point at which the material can be accessed prior to it being baled without shutting the whole plant down. Samples have been taken in the past to satisfy the quality standards required by onward processors. The contaminations fractions from these samples are currently applied to the volumes of plastic removed from site and these numbers are reported in the waste returns. This is a temporary solution as a new baler and sampling chute is being installed to allow the appropriate number of samples to be taken as per the requirements of the regulations.

Records and Reporting

Records for the sampling and reporting are well kept with all appropriate safeguards and checks in place to ensure the adequate number of samples are taken and that the samples are of the correct volume.

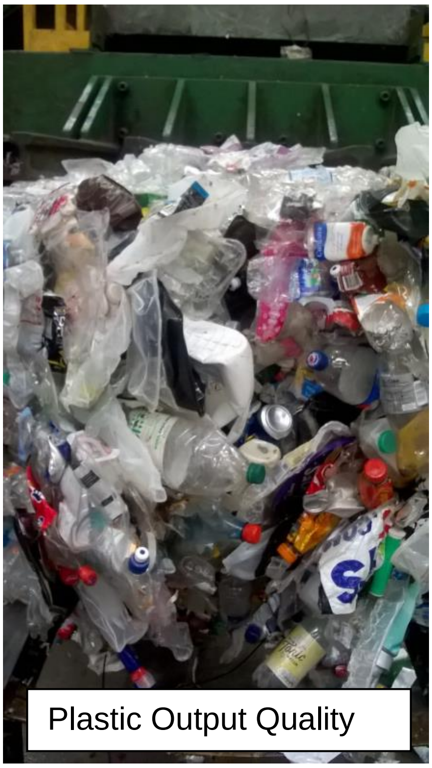
Duty of Care paperwork was available for inspection and contained all the required information.

The only concerns received on site with regards to customer specification relate to moisture content which can vary seasonally - if a valid claim is made the price of the material is changed.

Output Quality

Input and Output quality was visually assessed and appears to reflect the figures reporting in the Materials Facility Returns.


Metal Output Quality


Plastic Output Quality

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Operator/ Permit	May Gurney Ltd	Date	20/08/2015

Section 3- Enforcement Response — Only one of the boxes below should be ticked	
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.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.