

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

Site	Glass Tech Recycling Ltd			Permit Ref	102863		
Operator/ Permit holder	Glass Tech Recycling Ltd						
Date	28/09/2015			Time in	10:00	Out	11:15
What parts of the permit were assessed	Permitted area						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Karen John - Managing Director						
Officer's name	Gareth M Davies, Jonathan Willington			Date issued	27/10/2015		

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	C2	1.1.1
	3. Materials acceptance	C2	2.1.1 / Table 2.1
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	NA	
	2. Land & Groundwater	NA	
	3. Surface water	NA	
	4. Sewer	NA	
	5. Waste	NA	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
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	2	Total compliance score (see section 5 for scoring scheme)	62
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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.

Present

Karen John (KJ) - Managing Director, Glass Tech Recycling Limited
Gareth Davies (GD) – Senior Environment Officer, Natural Resources Wales
Jonathan Willington (JW) – Team Leader, Natural Resources Wales

The purpose of the compliance visit was to assess compliance with the environmental permit (reference EPR/YP3795VF) held by Glass Tech Recycling Limited. Further to this it was to establish what the current status is for operations being transferred to the Kings Dock, Swansea following the issue of permit EPR/YB3993HW to Glass Tech Recycling Limited.

KJ confirmed that the container glass and plate glass operations at Tank Farm Road are due to be transferred to the Kings Dock site in Swansea by the end of October 2015. All machinery will be taken down to the new site. A loading shovel will remain at the Tank Farm Road site to load material stock kept on site.

As highlighted during previous compliance visit it was confirmed that the storage of the mixed waste stockpile on site is a breach of condition 2.1.1 in that waste types not specified in Table 2.3 are being stored on site. The waste types that are not specified include plastic, paper, metal and wood. Photographs of the stockpile can be seen below. The mixed waste stockpile can be seen behind the crusher and tanker and has the vegetation growing out of the top. KJ estimated that there was 90,000 tonnes with in the mixed waste stockpile.



As GD highlighted on site, this has been scored a Category 2 breach under C3 Materials Acceptance for breach of condition 2.1.1 and Table 2.1. As highlighted above, Table 2.1 states that the activities are limited to the secure storage of wastes listed in table 2.3 pending treatment.

Further to this it has been scored a Category 2 breach for Condition 1.1.1 under C2 General Management – Management Systems and operating procedures.

KJ provide information on the expected processing capacity of the site at Kings Dock. It is expected that the site will be capable of processing 30 tonnes per hour. Glass Tech Recycling Limited intend to operate 2x 7 hour shifts per day, 5 days per week. This equates to a treatment capacity of up to 2,100 tonnes per week.

GD confirmed that it was the intention of Natural Resources Wales to serve a Regulation 36 Notice requiring Glass Tech Recycling Limited to take the relevant steps to comply with conditions 2.1.1 of their environmental permit EPR/YP3795VF. Confirmation of the timescales put in place will be agreed separately. Within the Regulation 36 Notice, requirements will be put in place for Glass Tech Recycling Limited to provide updates on progress against the Regulation 36 Notice.

KJ confirmed that a further 2 members of staff, James Bidder and David Evans had completed WAMITAB Training Courses. Copies of their certificates were provided.

A site tour was also completed.

END

	EPR Compliance Assessment Report	Report ID: 102863/0250583
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Site	Glass Tech Recycling Ltd	Permit 102863
Operator/ Permit	Glass Tech Recycling Ltd	Date 28/09/2015

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.		X
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			
C2	C2	Glass Tech Recycling Limited are required to remove the non-permitted waste types within an agreed timescale.	To be confirmed
C3	C2	Glass Tech Recycling Limited are required to remove the non-permitted waste types within an agreed timescale.	To be confirmed

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.