

**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	25/02/2019	Time in	11:55	Out	13:25
Assessment type	Report/Data Review				
Parts of the permit assessed	C2				
Lead officer's name	James, Ian				
Accompanied by	Tennant, Alexandra				
Recipient's name/position	Fraser McIntyre/ TCM	Date issued	27/02/2019		

### 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)	<b>0</b>
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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

**Summary of meeting held at Recresco Ltd, Cwmbran on Monday 25<sup>th</sup> February 2019 between Recresco Ltd (EPR-DB3797TC) and Natural Resources Wales (as regulator).**

**Onsite – 1155 to 1325**

Those present;

For Recresco:

KE (Production Manager)

PM (Consultant)

FM (Technically Competent Manager)

Tim Gent (Director)

For NRW:

Ian James (Environment Officer - Industry and Waste Regulation)

Alexandra Tennent (Environment Officer – Natural Resources Management)

## Background

This meeting follows a site inspection on 15<sup>th</sup> Jan 2019 and the subsequent actions arising from that. The three areas covered were;

### 1. TCM/WAMITAB

The requirement for attendance was confirmed by NRW (IJ) as being 20%, based on a OPRA of 6 and using the guidance, "How to comply with your environmental permit".

Recresco stated that the TCM (FM) was in attendance on average every two weeks.

NRW re-iterated the requirement for a 20% attendance, 1 day a week, and Recresco asked whether a proposal to accept a reduced attendance would be considered based on their plan to put two local staff through WAMITAB qualification within a time period of 4-6 months.

NRW (IJ) stated that due to the recent good compliance record and evidence of a desire to train local staff in the WAMITAB qualification NRW would be pleased to receive a written request to move to a 2 weekly attendance for a period of 6 months whilst the additional staff were being trained.

**Action – Recresco to provide a written request and justification for the change in TCM attendance, with supporting evidence of booked WAMITAB courses including modules to be completed.**

**Due – 11<sup>th</sup> March 2019**

### 2. Waste Returns

NRW clarified that the requirement to produce waste return information had been overlooked in the production of the original permit. This being the case NRW were leading a variation to include the waste returns condition.

Recresco were concerned that the requirement might be imposed with limited notice.

NRW (IJ) stated that the permit variation wouldn't be expected to be issued until the end of April 2019 and that the requirement to submit the waste returns information wouldn't commence until the start of the next complete quarter.

Recresco were accepting of this approach.

**Action – Recresco to commence collation of waste return information as soon as reasonably practicable and at least by the start of the quarter immediately after issue of the permit variation.**

**Due – TBC by permit issue date.**

### 1. Management System / EMS

Recresco (PM) explained that the company had previously been accredited to ISO standards and produced comprehensive management systems but these had become outdated/unused since the ISO accreditation lapsed due to a business decisions and financial pressures. It was also mentioned another Recresco site had a handheld system for safety and environmental checks which it was planning to introduce at the Cwmbran

site soon.

NRW (IJ) accepted that there were systems in place and suggested that an overarching document to signpost these along with a streamlining of processes to allow them to be worked in practice would be appropriate, this being in line with Recresco proposals.

A time frame of 3 months was agreed for this to be in place.

**Action – Recresco to provide overarching document for processes used to comply with the requirements of the Permit conditions as guided by “How to comply with your environmental permit”.**

**Due – 14<sup>th</sup> May 2019.**

### Observations

It was pleasing to note the attendance and contribution of Mr Tim Gent (Director) at the meeting. Mr Gent reiterated the company’s commitment to the environment and in providing the support to local management in achieving this.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034756**

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Operator/Permit holder	Recresco Limited	Date	25/02/2019

### 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. 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.