

Compliance Assessment Report

Report ID:
CAR_NRW0000096

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

Site	Glass Tech Recycling Ltd	Permit Ref	YP3795VF			
Operator/Permit holder	Glass Tech Recycling Ltd					
Regime	Waste Operations					
Date of assessment	10/03/2016	Time in	10:00	Out	10:45	
Assessment type	Audit					
Parts of the permit assessed	Permitted area					
Lead officer's name	Davies, Gareth					
Accompanied by						
Recipient's name/position	Karen John/ Managing Director	Date issued	26/04/2016			

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	
C2 - General Management - Management system and operating procedures	C2 - Suspended	1.1.1
C3 - General Management - Materials acceptance	C2 - Suspended	2.1.1 and Table 2.1
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	----------	---	----------

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

Present

Ceri Litchfield (CL) - Glass Tech Recycling Limited (GTRL)

Gareth Davies (GD) – Natural Resources Wales (NRW)

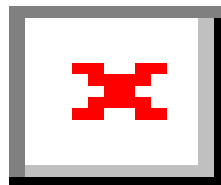
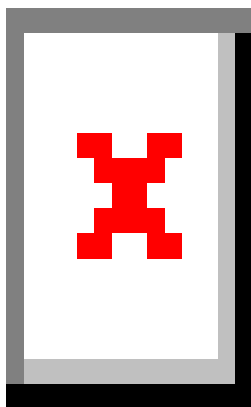
The purpose of the compliance visit was to assess compliance with the environmental permit (reference EPR/YP3795VF) held by GTRL as well as to discuss the actions being taken following a number of odour reports received by Natural Resources Wales.

Odour Reports

GD confirmed that we have received a number of complaints relating to odour coming from the GTRL site. The reports have originated from the new Coed Darcy development that is being built close to the site. CL confirmed that there were a number of operational issues that had resulted in some odour being detected off site. GTRL are waiting for their new site to start operations at Kings Dock, Swansea. GTRL had previously stopped accepting more material from one of the main importers of waste in order to reduce the volume of potentially odourous material on site, with the aim of sending it directly to the Kings Dock site. The importer was unable to stockpile any further material so it had to be imported to the site Llandarcy. Following the recent import of material GTRL do not intend to accept any more container glass at the Llandarcy site. CL also confirmed that they are awaiting a machinery part in order to process and handle the material further. Once the site is operational at Kings Dock, it is then the intention to process no further material at the Llandarcy site and it will all be transport to Kings Dock for processing.

GTRL have also taken a number of further steps in addition to the above to minimise any odour being detected off site.

- GTRL have been spraying the waste pile on an hourly basis with a deodoriser.
- Imported waste is not being pushed to the top and back of the site which is closest to the new housing development.
- GTRL have been reviewing the type and concentration of deodoriser being used.
- GTRL do not intend to handle the material once an initial clearance of the weighbridge area is completed.
- GTRL have been undertaking hourly odour checks of the surrounding area. These can be seen in the photographs below.



Waste Returns

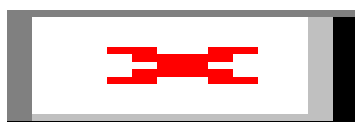
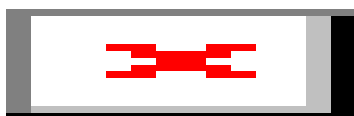
Waste Returns submitted to NRW were reviewed and a number of observations made.

If any aggregate material is removed from site then this does not need to be included on the waste returns, but records kept in line with the aggregates protocol.

The coding of waste removed from site should be reviewed. If the material has been processed then there is the potential that the appropriate code for the waste would be within the 19 – Chapter rather than the source of the material.

Please could GTRL provide further information on the material that was exported to a Non UK destination.

Examples of the above can be seen in the pictures below.



Waste Storage

As highlighted during the compliance visit on 28 September 2015 the storage of the mixed waste

stockpile on site is a breach of condition 2.1.1 in that the waste types are not specified in Table 2.3 are being stored on site. The waste types that are not specified include plastic, paper, metal and wood.

This has been scored a Category 2 breach under C3 General Management - Materials Acceptance for breach of condition 2.1.1 and Table 2.1. Table 2.1 states that the activities are limited to the secure storage of wastes listed in table 2.3 pending treatment.

Further to above the score the mixed waste stockpile has been scored a Category 2 breach under Condition 1.1.1 under C2 General Management – Management Systems and operating procedures. The reason for this is that the written management system has not identified this breach and has resulted in a non-compliance with the permit.

Both of the above scores have been suspended as a Regulation 36 Enforcement Notice is in place. The suspension of score can only take place for 6 months. Any further non-compliances of the above condition will contribute towards GTRL's compliance rating for 2016.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

Following the site meeting GD and CL viewed the site at kings Dock. This report has been provided separately.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0000096**

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

Site	Glass Tech Recycling Ltd	Permit Ref	YP3795VF
Operator/Permit holder	Glass Tech Recycling Ltd	Date	10/03/2016

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			
C2	C2	The mixed waste stockpile shall be removed from site.	31/05/2017
C3	C2	The mixed waste stockpile shall be removed from site.	31/05/2017

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.