

Compliance Assessment Report

Report ID:
CAR_NRW0024786

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	11/07/2016	Time in	09:45	Out	10:30
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	08/08/2016		

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	1.1.1
C3 - General Management - Materials acceptance	C2	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 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
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 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

Karen John (KJ) – Glasstech Recycling Limited (GTRL)

Ceri Litchfield (CL) – Glasstech Recycling Limited

Gareth Davies (GD) – Senior Environment Officer

The purpose of the visit was to assess compliance with the environmental permit held by Glasstech Recycling Limited, EPR/YP3795VF and assess compliance with the Regulation 36 Notice.

Site Tour

An initial site tour was carried out and further discussions were held at the offices of the Kings Dock site.

A large stockpile of plate glass was being stored on site. KJ of GTRL confirmed that they were awaiting confirmation for when a ship could berth at Swansea Docks. Once the ship was scheduled for arrival. GTRL would then transport all of this material to Swansea Docks for it to be loaded directly for export. Once this stockpile has been removed then no further plate glass will be brought to site and it will only be accepted at the Kings Dock site. The stockpile can be seen in the picture below. Following the compliance visit KJ confirmed that there is currently 4945 tonnes of mixed plate glass on site.



Further to the plate glass on site, there are 2 stockpiles of material. The mixed waste stockpile and the container glass stockpile.

Since the middle of March 2016, no further container glass has been accepted on site. Since this time no reports of odour have been received by Natural Resources Wales. There is currently no treatment of the container glass on site to produce an aggregate. It is noticeable that the aggregate stockpile on site has

reduced since the last compliance visit. This material is awaiting export to the new facility in Swansea Docks. Following the compliance visit KJ confirmed that there is currently 14,573 tonnes of container glass on site that was imported by Glass Tech.

Approximately 500 tonnes of material has been sent to the Swansea Docks site in order to refine the process. A number of pictures of the stockpile can be seen below. The first picture shows the location of where the 500 tonnes of material has been taken from also circled in red. Going forward, a large section of the material will be removed from behind the weighbridge and weighbridge office. Once this has been removed, it is the intention to then gain access to the mixed waste stockpile.



As highlighted during previous compliance assessment visit, 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. The mixed waste stockpile can be seen in the photograph below, to the rear of the machinery and with vegetation on the top.



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 the above score, the mixed waste stockpile has been scored a Category 2 breach of 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.

A Regulation 36 Notice has been served for the above breaches.

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

END

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.

EPR Compliance Assessment Report

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Operator/Permit holder	Glass Tech Recycling Ltd	Date	11/07/2016

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.

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.

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