

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	22/05/2018	Time in	12:40	Out	13:15
Assessment type	Audit				
Parts of the permit assessed	Permitted area				
Lead officer's name	Davies, Gareth				
Accompanied by					
Recipient's name/position	Karen John/ Director	Date issued	22/06/2018		

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
A1 - Specified by permit	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	C2	1.1.1
C3 - General Management - Materials acceptance	A	
	C2	2.1.1 and Table 2.1
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F4 - Amenity - Pests/birds and scavengers	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) - Glass Tech Recycling Limited (GTRL)

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

This was an unannounced inspection to assess GTRL's compliance with their environmental permit, EPR/YP3795VF.

A site tour was undertaken and a number of changes on site were observed.

In the eastern corner of the site GTRL have removed one of the buildings that was used to store incoming waste material. Initial hand treatment involving the removal of metal and plastics attached to window panes took place in this area. This has now been relocated to GTRL's other permitted site. The area where the building was located can be seen in the photograph below.



The remaining stockpile of material that is awaiting export will now be transported to GTRL's other permitted site when a ship is ready for loading.

GTRL are now only undertaking the import of pure plate glass for production in to a replacement for virgin material. This process will be relocated to GTRL's other permitted operation once the updates have been made on site.

Upon inspection efforts have also been made to remove some of the mixed waste stockpile from site. Removal of material has currently ceased due to restrictions in place at GTRL's other permitted operation. KD believes that there is less material within the stockpile than was previous thought. It is anticipated that once improvements to the process have been made at GTRL's other permitted site then removal of the mixed waste stockpile will be able to re-commence.

As highlighted during previous compliance assessment visits, 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. The area where waste has been removed can be seen in the photographs below and the area also highlighted red.



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 waste 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 remains in place for the above breaches.

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

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

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033524**

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Operator/Permit holder	Glass Tech Recycling Ltd	Date	22/05/2018

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.	31/01/2019
C2	C2	The mixed waste stockpile shall be removed from site and the written management system updated.	31/01/2019

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.