

EPR Compliance Assessment Report

Report ID: 104542/0238351

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

Site	Paperback Collection & Recycling Ltd			Permit Ref	104542		
Operator/ Permit holder	Paperback Collection & Recycling Ltd						
Date	10/04/2015			Time in	14:00	Out	16:00
What parts of the permit were assessed	All below						
Assessment	Site Inspection	EPR Activity:	Installation		Waste Op	X	Water Discharge
Recipient's name/position	Gordon Anderson						
Officer's name	Rhys Ellis, Mandy Langstaff			Date issued		30/04/2015	

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	A	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	C3	2.2.1
	4. Storage handling, labelling, segregation	C3	2.3.1
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	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	N	
	2. Energy	N	

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)

8

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.

Visit report/comments:

This was a pre announced routine site inspection followed by a meeting to discuss general updates - specifically in regards to the permit variation that the operator has submitted to Natural Resources Wales..

Present on site from Natural Resources Wales was Senior Environment Officer Mandy Langstaff and Environment Officer Rhys Ellis.

Present from Paperback Collection & Recycling Ltd were Gordon Anderson and Tony Whitaker and also their consultant Clare Walters.

Thank you for your time in taking us around and explaining the site operations

Observations:

C3 – General management - Waste acceptance

It was explained during the visit that the site is currently accepting light fraction residue waste (E.W.C) 19 12 12 from MRF plants in your area. It was noted that the permit does not allow the acceptance of this material and therefore a breach of condition 2.2.1 of your permit.

On this occasion it has attracted a **CCS breach of 3.**

However we do acknowledge that there is a permit variation that is currently been determined by our permitting centre (part of this variation is to include this waste type). Any subsequent scoring for this issue will be suspended until we know the outcome of the permit variation.

C4 General Management - Storage of bailed material

Permit condition 2.3.1 stipulates that unless stored and treated outside as specified waste

1. All bulking, transfer or treatment of waste shall be carried out inside a building
2. All waste shall be stored in a building or within a secure container
3. All waste shall be stored and treated on an impermeable surface with sealed drainage

All bailed RDF is stored outside – contrary of the permit condition. Some of the plastic wrap on the bailed material was damaged and the content of the bale was exposed to the elements. It was explained that the damage might have been caused due to the loading operation, Mr Anderson advised that this matter will be raised and discussed with site staff. Also some of the RDF is stored on permeable surface.

Baled dry mixed recyclables are also stored outside.

On this occasion a **CCS breach of 3** has been scored.

However we do acknowledge that there is a permit variation that is currently been determined by our permitting centre (part of which is to permit storage of waste outside). Any subsequent scoring for this issue will be suspended until we know the outcome of the permit variation.

Current stock on site

There appears to be a considerable amount of baled material on site. You provided a copy of your stock management programme April 2015 – March 2016. According to your current site layout there is approximately 10,790 tonnes of baled material on site

Your stock management programme stipulates that the current intake of Light Fraction Residue containing no organics or putrescible waste is 850 tonnes per month. The out-take commencing May 2015 will be 1500 tonnes per month.

You have stipulated, the management of the yard stock will progress on a number of fronts including

1. Fire prevention and Environmental control
2. Health and safety measures to incorporate safe stack storage and access via fire breaks
3. Permitted limits applied in agreement with NRW
4. Compliance with and governance of the site EMS

Please note that the EMS should be updated to reflect this. Your EMS must show how you will minimise risks of pollution from your activities. You then need to follow it and keep it up to date.

F) Amenity – Pests , birds and scavengers

Flies were evident on site. Please ensure that this issue is being monitored and addressed

B4 – Infrastructure – Site drainage

During the visit site drainage was briefly discussed. It was agreed that the site would provide more information on this matter particularly as this information will be required in the permit variation process.

C) Staff competency/training

Environment Officers were advised that Gordon Anderson holds a certificate of technical competence and Tony Whittaker is completing his accreditation. Please can you forward me a copy of the relevant certificates no later than 29th May 2015. Please can you also confirm if a continued competence test has been completed (if applicable).

Future operations

It was discussed that the company are trialling the recovery of other waste material i.e wood based waste for biomass etc. You confirmed that such trials do not occur at this site. If at any stage you propose to change or vary your operations it's advisable that you liaise with your regulating officer at the earliest opportunity.



Incoming feedstock prior to any treatment.



Bagged co-mingled recyclables accepted on site



Paper waste storage point (Bunker used for source segregated mixed paper)



Trommel and associated treatment kit including magnet, blower, eddy current separator etc.



Treated light fraction residue waste to be sent through a second picking line



Baled dry recyclables stored outside



Baled RDF on site (Some stored on Impermeable ground), some of the wrap on the bales is damaged.

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Operator/ Permit	Paperback Collection & Recycling Ltd	Date 10/04/2015

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			
C3	C3	Vary permit or stop accepting unpermitted waste type	In process
C4	C3	Damaged RDF bales stored outside and some stored on permeable ground	In process
C1	No score	Site to forward a copy of the relevant certificates of technical competence. Please can you also submit Continued Competence certificates (if applicable).	29/05/2015

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.