

	EPR Compliance Assessment Report	Report ID: 104542/0255976			
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 Limited				
Date	22/12/2015	Time in	14:30	Out	15:35
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 / Tony Whittaker				
Officer's name	Rhys Ellis, Amanda Langstaff		Date issued	05/02/2016	

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	A			
	4. Storage handling, labelling, segregation	C3			2.1.1 (Table S1.1)
d) Incident management	1. Site security	A			
	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	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	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	NA			
	2. Energy	NA			
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	1	Total compliance score (see section 5 for scoring scheme)	4
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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.

This was a routine site inspection.

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

Present from Paperback Collection & Recycling Ltd was Tony Whitaker who took us around site. We briefly met with Gordon Anderson following the inspection to discuss our observation during the inspections etc.

Observations:

C4 General Management - Storage of baled material

Table S1.1 of your permit stipulates limits of activities.

It stipulates that for post treatment the following waste types only, can be stored either inside the building or outside

- Refuse derived fuel or solid recovered fuel that has been baled and wrapped on site

It was evident today that all baled RDF is stored outside. However some of the plastic wrap on the baled material was damaged and the content of the bale was exposed to the elements this breaching the condition above. It is also noted that some of this material has become loose and may contribute to litter issues.

It is also concerning that some of the RDF has been on site for a considerable amount of time. (it was noted today that vegetation was growing from some of the bales indicating the length of time the material has been on site.)

Un-wrapped bales of RDF were also stored outside contrary to the permit condition. It was explained that some of these bales require re-processing to improve the quality of the RDF.

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

Action

- Site to provide written response of how they are progressing in relation to the stock management programme that was previously submitted to Natural Resources Wales, your response should include current tonnage of baled material on site, current intake and outtake and an updated layout diagram
- Your response should also detail what actions are taken to the damaged baled material on site.(Particularly the damaged bales located at the back of the site as seen in photograph 1 to 4)

- Response to include actions to be taken (including timescales) for the RDF bales that are not wrapped currently stored outside.

You indicated in your stock management plan 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

It was previously advised to you that the EMS should be updated to reflect this as your EMS ultimately demonstrates how you will minimise risks of pollution from your activities.

Please confirm if this has been undertaken and forward any updated EMS sections where applicable.

Please action and submit the required information in relation to the above matter no later than 20th February 2016

B4 – Infrastructure – Site drainage

It was explained to officers on site that an interceptor has been installed on site. (Photograph 14).

C) Staff competency/training

Environment Officers were advised during a previous visit 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 5th February 2015. Please can you also confirm if a continued competence test has been completed (if applicable).

Other observations-

Waste trommel fines

Significant amount of fines were noted to be stored on site. It was explained that there is a backlog on site due to an issue with the haulier. Please ensure that the levels stored on site are reduced as a matter of priority. Please keep me updated in relation to this matter. Please also provide information of the location where this material is sent too.

Environmental Permitting (England and Wales) (Amendment) Regulations 2014 Schedule 9A Material Facilities.

The above regulations were discussed during the visit. In summary these regulations establish a new category of permitted facilities, Material Facilities. These are facilities that accept greater than 1,000 tonnes per year of a mixture of the following materials; paper, glass, metals and plastics, for sorting for the purpose of recycling.

The regulations require the site operator to self-assess whether their facility falls within the definition of Materials Facility as set out in the regulations.

This was discussed with the operator who advised that they would look into this matter.

I have enclosed additional guidance with this CAR form in relation to this matter.

Separate collections

We would like to remind you that since 1st January 2015 waste collection operators including private companies, social enterprises and local authorities are required by statute to provide their customers with separate collections for paper, metal, plastic and glass. This is necessary to improve the quality of recycled material by reducing contamination at the point when the recycled material is collected.

This applies to waste from all sources, industry (including construction and demolition), commerce (including retail, hospitality and offices), charities and households.

Failure to adhere to abide by these requirements does constitute an offence under the Waste Regulations (England and Wales) 2011 regulations.



Photograph 1. Damaged Baled RDF leaning right against the perimeter fencing.



Photograph 2. Damaged Baled RDF leaning right against the perimeter.



Photograph 3. Damaged baled RDF



Photograph 4. Damaged baled RDF



Photograph 5 . Vegetation growing from RDF bales



Photograph 6 . Large amount of RDF stored on site.



Photograph 7 Large amount of RDF stored on site.



Photograph 8 Large amount of RDF stored on site.



Photographs 9- 11. Unbaled RDF



Photographs 12 and 13. Unbaled RDF and damaged baled RDF.



Photograph 14. Location of interceptor tank.

Natural Resources Wales' means the Natural Resources Body for Wales established in Article 3 of the Natural Resources Body for Wales (Establishment) order 2012

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Operator/ Permit	Paperback Collection & Recycling Limited	Date 22/12/2015

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			
C4	C3	- Site to provide written response of how they are progressing in relation to the stock management programme that was previously submitted to Natural Resources Wales, your response should include current tonnage of baled material on site, current intake and outtake and an updated layout diagram - Your response should also detail what actions are taken to the damaged baled material on site.(Particularly the damaged bales located at the back of the site as seen in photograph 1 to 4) - Response to include actions to be taken (including timescales) for the RDF bales that are not wrapped currently stored outside	4th th March 2016

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.