

Compliance Assessment Report

Report ID:
CAR_NRW0026776

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

Site	Paperback Collection & Recycling Ltd	Permit Ref	JB3932RM		
Operator/Permit holder	Paperback Collection & Recycling Limited				
Regime	Waste Operations				
Date of assessment	11/11/2016	Time in	10:30	Out	12:30
Assessment type	Site Inspection				
Parts of the permit assessed	waste storage, labelling, handling and segregation. Site operations				
Lead officer's name	White, Steven				
Accompanied by	Ellis, Rhys				
Recipient's name/position	Gordon Anderson/ Director	Date issued	29/06/2017		

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
C4 - General Management - Storage, handling labelling and Segregation	C3	2.3.1
	C3	2.2.1

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)	8
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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

The inspection was carried out as a handover visit between the previous regulating officer (Rhys Ellis) and the new regulating officer (Steven White), and as a meeting requested by Director Gordon Anderson to discuss future site management proposals. Following the meeting with Gordon Anderson and Tony Whittaker. Officers conducted a site inspection on the treatment and storage areas.

The following observations were noted and brought to the attention of the site manager.

The Fire Prevention Plan (FPP) is now part of the EMS for the site. A recent Fire Service visit produced a number of recommendations including putting fire gaps between the RDF/SRF piles and between Paperback and neighbouring sites. These recommendations look as though they have been taken on board and improvements on site are underway.

Prior to the meeting Officers carried out perimeter inspection where it was observed that two bales had fallen from the storage area off site onto a patch of land adjacent to the site. This was brought to the attention of the site manager during the visit and officers were assured that the bales would be placed back within the permitted boundary. As the waste is not stored within the permitted boundary this is classed as a breach of permit condition 2.2.1; outlined below.



Bales of SRF off site

Towards the rear of the site some of the stacked bales had collapsed, a number of the bales were observed to be ripped and in poor condition; this can give rise to odour and vermin as the waste breaks down. There is no reference to duration of storage of waste in the permit/EMS/FPP, from reviewing photographs on past CAR forms it is evident that the waste to the rear of the site has not moved for at least 12 months. Vegetation was observed growing from a number of these bales; indicating that these bales have been on site for a considerable time.



Vegetation growing from bales



Collapsed and ripped bales of RDF/SRF towards the rear of the site

Table S1 of the permit stipulates that only RDF/SRF that has been baled and wrapped can be stored outside, all other waste must be stored inside a building following treatment. As the bales are not wrapped anymore and the RDF/SRF is open to the elements and pests/vermin this is classed as a breach of permit condition 2.3.1; outlined below.

It is recognised that a large amount of work has been carried out at Paperback to reduce the amount of waste on site, and that there is a stock management plan in place which will mean that a lot more work will be carried out on site to decrease the. An area on the south side of the site which had previously had large amounts of litter and unwrapped bales had been cleared and was now being used for storage of wrapped bales.

There is a large amount of baled RDF/SRF on site, officers are unable to accurately estimate the volumes. The most recent site management plan estimates that there is approximately 6500-7000T on site with an average weight of each bale being ~600kg

1.1.1a: The operator shall operate manage and operate the activities in accordance with a written management system – the site would be unable to alleviate the risk of fire by having large amounts of waste on site, the site permit does not state how much can be stored at any one time, however the FPP proposes that total quantity of processed RDF/SRF in the external yard area to be no more than 12000T.



During the visit a stock management plan was provided and discussed and estimates that (with an average weight of each bale being ~600kg) there is approximately 6500-7000T on site. An accurate measurement of the total quantity of baled SRF/RDF on site is required, please can you forward the current volumes of baled material that are on site by 13th April 2017.

Permit Breaches

2.2.1 – The activities shall not extend beyond the site shown on schedule 7 of this permit (a number of bales of RDF/SRF were observed outside of the permitted boundary) - a CCS score of **C3** has been recorded for this breach of permit condition.

2.3.1 - Table S1 of the permit stipulates that only RDF/SRF that has been baled and wrapped can be stored outside. A number of bales stored outside were damaged and ripped with the contents of the bales exposed to the elements and to pests/vermin. A CCS score of **C3** has been recorded for this breach of permit condition

Thank you for your time. Please find my contact details below

Steven White – Environment officer

Tel: 03000 653 913

Email: steven.white@naturalresourceswales.gov.uk

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	Paperback Collection & Recycling Limited	Date	11/11/2016

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			
C4	C3	Ripped and damaged bales must be removed from the external yard and wrapped	13/04/2017
C4	C3	Bales outside of permitted boundary must be returned to within the permitted boundary	02/02/2017

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 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.