

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

Site	Metech Recycling	Permit Ref	EPR/DP3598FP		
Operator/Permit holder	Metech Recycling (UK) Ltd				
Regime	Waste Operation				
Date of assessment	16/6/2016	Time in	12:20	Out	13:18
Assessment type	Inspection				
Parts of the permit assessed	Site operations				
Lead officer's name	Cathy Lloyd	Accompanied by		Gareth Davies	
Recipient's name/position	Mike Killett / director Metech Recycling (UK) Ltd	Date issued	05/07/2016		

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	N	
B2 - Infrastructure - Closure and decommissioning	N	
B3 - Infrastructure - Site drainage engineering (clean and foul)	2	1.1.1
B4 - Infrastructure - Containment of stored materials	2	2.1.2 & WEEE1
B4 - Infrastructure – Plant and equipment	N	
C1 - General Management - Staff competency/training	3	1.4.1
C2 - General Management - Management system and operating procedures	N	
C3 - General Management - Materials acceptance	3	1.1.1
C4 - General Management - Storage, handling labelling, labelling and Segregation	2	1.2.1
D1 - Incident Management - Site security	N	
D2 - Incident Management - accidents, emergency and incident planning	N	
E1 - Emissions - Air	N	
E2 - Emissions - Land and groundwater	N	
E3 - Emissions - Surface water	N	
E4 - Emissions - Sewer	N	
E5 - Emissions - Waste	N	
F1 - Amenity - Odour	N	
F2 - Amenity - Noise	N	
F3 - Amenity - Dust/ fibres/ particulates/ litter	N	
F4 - Amenity - Pests/birds/scavengers	N	
F5 - Amenity - Deposits on road	N	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	N	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	N	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	N	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	4	6.2.2
H1 - Resource Efficiency - Efficient use of raw materials	N	
H2 - Resource Efficiency - Energy efficiency	N	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	6	Total compliance score (see section 5 for scoring scheme)	4.1
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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 (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 including:
 - details of advice given;
 - any other areas of concern;
 - any actions requested;
 - any examples of good practice;
 - a reference to photos taken.

Present

Graham Bateman – Metech Recycling (UK) Ltd

Cathy Lloyd – Natural Resources Wales, Environment Officer

Gareth Davies – Natural Resources Wales, Snr Environment Officer

The purpose of the compliance visit was to determine how much waste has been removed since the previous inspection on the 26/5/2016. Little progress has been made to remove waste from the site, although filing cabinets from the offices were being removed during our inspection.

Due to the poor performance we have served a regulation 36 notice to comply with your permit. It is an offence not to comply with this notice. Scores for any breach of condition that is subject to the regulation 36 Notice will be suspended and will not count towards your compliance rating. If you fail to comply with the notice the scores will be unsuspended and the scores will count toward your compliance rating. We are assessing what enforcement action to take following this inspection, which may include prosecution. If you intend to recommence waste treatment at the site please contact me before importing waste as I will need to inspect the building to ensure repairs have been carried out.

C1 General Management – changes to technically competent person 1.4.1 category 3 breach

Please confirm the name and qualifications of the technically competent person for the site.

G4 Monitoring and Records, Maintenance and Reporting – Reporting to Natural Resources Wales, condition 6.2.2 category 4 breach

A summary of the waste types and quantities accepted and removed from the site shall be made each quarter of the financial year. The last submission made to NRW was for the period October to December 2015. Please report the waste imported and removed from the site during the period January to March 2016.

B3 Site drainage engineering Condition 1.1.1 category 2 breach

The permit allows storage on areas of impermeable pavement and within the building. No waste management operation shall be authorised by this permit unless specified in and undertaken in accordance with the limitations in Table 1.1. Treatment and storage of waste are permitted on areas of impermeable pavement with sealed drainage system and within the building which is maintained to prevent the ingress of water. Waste was being stored within the damaged building and outside the building within the site boundary.

No progress has been made removing the waste being stored. Your permit does not authorise you to store waste outside unless it is waste specified in your working plan. **This is subject to a regulation 36 notice. This score has been suspended.**



Photograph showing wood, cardboard and plastic being stored outside, an area where you are not authorised to store waste as it is not on a sealed drainage system. (Photo ref.P1020370)



Photograph showing plastic, wood and cardboard being stored outside, an area where you are not authorised to store waste as it is not on a sealed drainage system. (Photo ref.P1020369)

B4 Infrastructure – Containment of stored materials Conditions 2.1.2 Table 2.1d, WEEE1 category 2 breach

Where wastes are stored in a building, the building shall be constructed and maintained to prevent the ingress of rain and surface water.

All WEEE permitted to be accepted under the permit shall be stored in areas provided with a weatherproof covering. WEEE waste was being stored within the fire damaged building and outside the building within the site boundary. **This is subject to a Regulation 36 Notice. This score has been suspended.**



Photograph showing some of the waste stored in the damaged building. Waste is not authorised to be stored in this area as the building has not been maintained to prevent the ingress of water. (Photo ref:P1030373)

C3 General Management – Materials Acceptance 1.1.1 category 3 breach

The maximum amount of waste stored pre or post – specified recovery operations shall not exceed 210 tonnes. More than 210 tonnes of waste is being stored at the site. **This is subject to a regulation 36 notice. This score has been suspended.**



Photograph showing waste stored within the damaged building. (Photo ref: P1020359)

C4 General Management – Storage, handling labelling and segregation. Condition 1.2.1. category 2 breach

Non – conforming waste has been accepted including polystyrene, cardboard, fridges, freezers, office equipment including chairs and furniture. Table 1.3 in the permit modification issued in 3/4/2012 that was issued to ensure it complies with the WEEE Directive, clearly states that the permitted waste types authorised by the modification applies to the waste listed under condition 1.2.1. **This is subject to a regulation 36 notice. This score has been suspended.**



Photograph showing non-conforming waste including fridges, freezers, wood and cardboard. (Photo ref P1020386)

Compliance Assessment Report

Report ID: NRW0023726

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

Site	Metech Recycling	Permit Ref	DP3598FP
Operator/Permit holder	Metech Recycling (UK) Ltd	Date	16/06/2016

Section 3 – Enforcement Response

Only one box 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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

X

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			
B3	C2	A regulation 36 Notice has been issued requiring Metech Recycling to comply with the conditions of the permit	31 August 2016
B4	C2	A regulation 36 Notice has been issued requiring Metech Recycling to comply with the conditions of the permit	31 August 2016
C1	C3	The services of a Technically Competent Manager must be obtained to ensure the removal of waste is carried out correctly. Please supply details of the technically competent manager of the site and include their relevant qualifications.	20 July 2016
C3	C3	A regulation 36 Notice has been issued requiring Metech Recycling to comply with the conditions of the permit	31 August 2016
C4	C2	A regulation 36 Notice has been issued requiring Metech Recycling to comply with the conditions of the permit	31 August 2016
D1	C2	A regulation 36 Notice has been issued requiring Metech Recycling to comply with the conditions of the permit	31 August 2016
G4	C4	Waste returns have not been made to NRW and are overdue. Please report the quantities of waste imported and removed from the site for the period January to March 2016	20 July 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 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 (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
- 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.