

Compliance Assessment Report

Report ID:
CAR_NRW0032234

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

Site	Lower Chapel Bridge Yard	Permit Ref	LB3093HH		
Operator/Permit holder	G L J Recycling Ltd				
Regime	Waste Operations				
Date of assessment	31/08/2017	Time in	10:30	Out	11:15
Assessment type	Site Inspection				
Parts of the permit assessed	EMS				
Lead officer's name	Bowder, Alex				
Accompanied by					
Recipient's name/position	Colleen Andrews/ Commercial Manager	Date issued	04/10/2017		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B2 - Infrastructure - Closure and decommissioning	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	4.2.2

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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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 (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

Officer Alex BOWDER attended GLJ Recycling Ltd on Thursday 31st August 2017 at 10:30 to carry out a routine inspection of permit **EPR-LB3093HH**. The weather was warm and dry at the time of visit. Met with business Director Gareth Jones and business representative Colleen Andrews.

Thank you to Gareth and Colleen for accompanying me around site and explaining business processes and updates. New operations manager Colin Manning.

Breach – Category 4

G) Monitoring and records, maintenance and reporting

Paragraph 4.2.2

“Within one month of the end of each quarter, the operator shall inform the Agency using the form made available for the purpose of, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter”

Waste Returns

The business has failed to provide evidence of submitted waste returns. It is your duty under your permit conditions to ensure your returns are submitted on time and available for viewing.

NRW have requested copies of the waste return documents from the business; we recommend filling out the specified spreadsheet available on our website so that copies are available for ease of access.

Reporting to Natural Resources Wales is paramount. You must be reliant on yourselves for correct and diligent submission. If there any issues as to why you cannot submit your returns within the allocated timeframe, then you must notify us.

Household and Commercial Transfer station

Fire Prevention and Mitigation Plans (FPMP)

Due to the recent changes to Standard Rules permits we are requiring all sites affected to produce a fresh Fire Prevention Plan for the work areas; GLJ Recycling Ltd falls within this remit. This should include fire breaks, maximum stockpile heights/sizes, and regular monitoring of piles for signs of heating.

We must be assured that your EMS addresses these issues. The document states storage times, maximum storage heights and fire breaks that you must adhere to ensure fire safety on site. Here is the link to the guidance that you must follow:

Points raised at the time of inspection:

- Height stacking of scrap and car shells - The site must state maximum storage height for car shell stacking and put this in your EMS.

Action: Create/amend Fire Action plan for various areas in the yard.

Deadline: 4th December 2017

We spoke about constructing bays for the sorting and storing of waste streams. Once completed this will aid the separation process.

Under condition 2.3 of the permit all waste must be inside:

Table 2.3 Operating techniques

1. Unless stored or treated outside as specified waste³:
 - a) all bulking, transfer or treatment of waste shall be carried out inside a building;
 - b) all waste shall be stored in a building or within a secure container.
 - c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.
2. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

If the site intends to extend operations, you must satisfy these conditions.



Picture 1 – showing transfer station unit full of waste

No sludge waste or material consisting of dust/powders was seen on site at the time of inspection. Drainage system functioning efficiently.

The unit was quite full of waste at the time of inspection. Ensure turnaround times are adhered to so that waste does not build up.

No breaches found.

Waste Electrical and Electronic Equipment (WEEE)

All treatment of WEEE carried out within the building. No treatment taking place at the time of visit. Spoke about whether there were allocated times of day for processing in the unit – as and when material comes in.

No unauthorised material appliances seen at the time of inspection.

If you have any issues with the report please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

EPR Compliance Assessment Report

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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.

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			
G4	C4	Make documents available - submit using online NRW spreadsheet	04/11/2017

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.