

Compliance Assessment Report

Report ID:
CAR_NRW0031735

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	10/05/2017	Time in	11:00	Out	11:45
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by	Goddard, Hannah				
Recipient's name/position	Colleen Andrews/ Waste Operations Manager	Date issued	12/06/2017		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	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	
	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	

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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Officers Alex BOWDER and Hannah GODDARD attended GLJ Recycling on Wednesday 10th May at 11:00 to carry out a routine inspection of permit **EPR-LB3093HH**. The weather was mild and dry at the time of visit. Spoke with business representative Colleen Andrews.

Introductory inspection as Alex Bowder takes over as the new regulating officer of the site's permits – thank you to Colleen for taking the time to explain to show us around site and explain the business processes. We discussed brief history of the site's activities and outlined the processes for the waste operations management.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we are not satisfied with a certain part of the inspection we can breach the business against your permit conditions which can affect your annual subsistence fees; this is scored on a Category 1-4 basis:

- 1** - Major, serious persistent and/or extensive impact on the environment, people/property
- 2** – Significant impact on effect on the environment/people/property
- 3** – Minor impact or effect on the environment/people/property
- 4** – A non-compliance which has no potential environmental effect

The business holds four standard rules set environmental permits, under two reference numbers:

EPR/LB3093HH

SR2008No3 – Transfer Station

SR2008No23 – Waste Electrical and Electronic Equipment (WEEE) Recycling

EPR/DB3097TJ

SR2008No20 – Vehicle dismantling

SR2008No21 – Metal Recycling

I was informed that the registered exemptions at the site in Cross Keys site is no longer operational:

EPR/NE5447SA - T9 and S2

The Cwmcarn site sits at the bottom of the valley alongside the Ebbw River. To the east of the site are industrial units and to north residential properties in the Chapel Farm estate.

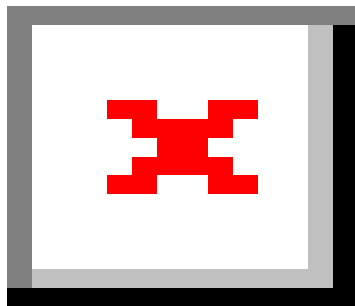
Waste transfer station

GLJ Recycling Ltd currently operate a small waste transfer station under the standard rules set SR2008 No3; household, commercial and industrial waste transfer station with treatment - **EPR/LB3093HH**. Operations at the yard were expanded to include WEEE recycling and as well as mixed skip collection waste transfer station activities.

This permit allows the acceptance and treatment of a range of non-hazardous wastes which is all stored in a unit at the rear of the yard.

The unit seemed a little messy in general with waste stored outside the front of the building, however no direct breaches of the permit in this instance. No unwarranted waste streams were seen to be accepted at the time of visit.

The transfer station permit covers the whole yard, however only the buildings that meet the infrastructure and drainage criteria of the permit can operate as a waste transfer station.



Picture 1 - Showing transfer station inside building with material outside entrance

Waste Electrical and Electronic Equipment (WEEE)

This permit only covers for the treatment of WEEE and must adhere to these rules:

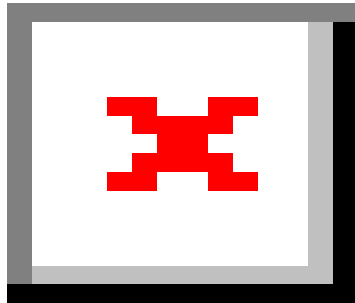
- No ozone depleting substances can be accepted onsite
- WEEE treatment must occur inside a building
- Work shall be carried out on an impermeable surface with sealed drainage system with provision of spillage collection facilities and, where appropriate, decanters and cleanser degreasers.

All work shall be carried out on an impermeable surface with sealed drainage system with provision of spillage collection facilities.

No breaches observed on this visit.

Amenity Issues

Due to the proximity to residential area in Cwmcarn, the site has historically had accusations of flies emanating from the site. The site stated that they have ceased accepting food contaminated waste due to the cleaning issues. I inspected all areas of the yard and could find no evidence of any organic waste that could be a potential breeding habitat for flies.



Picture 2 – showing empty containers at the rear of the site.

Infrastructure

No major issues with infrastructure were noted at the time of visit. Having examined previous CAR forms it was stated that the site was to replace and repair the impermeable surface at the top yard.

There were some areas pooling at the front of the yard next to the non-ferrous metal building. Was told that this gets swept towards the nearby drain - will look into the drainage system further upon my next inspection.

Burning of waste

Natural Resources Wales were called out to a reported incident last month concerning burning and smoke witnessed coming from the GLJ yard premises. It came to light that the security guard was burning household waste next to the security tower inside that gate of the site. We have informed the business that only green waste that is produced at the location can be burned, so long as it does not cause amenity issues.

A **warning letter** was issued for the occurrence and the site has vowed it will not happen again.

Environmental Management System (EMS)

Your EMS is meant to be a live document that tells us how you are going to operate your site in-line with the permit. It should be updated accordingly and staff should know where it is held at all times. The most

up-to date version I can locate is November 2012.

It was mentioned on previous reports that whilst the EMS itself refers to the ISO14001 certification the company has achieved it did not cover many of the aspects of the licence which we would expect to see to comply with the permit requirements.

I hope to examine your EMS in more detail and discuss on my next inspection.

Noise pollution and Operating times

No unreasonable noise levels were noted at the time of visit. Please ensure business vehicles adhere to your operating times. It was mentioned that if vehicles return to site late this has the potential to cause disturbances to the adjacent residential area, please be mindful of this.

WAMITAB

Action: Please could the business inform us who the current allocated Technically Competent Manager is for the site and send through the qualification holder's certificate for our records.

Site diary to check attendance was not looked on this inspection.

Waste returns

There only seems to be one return document from 2015 on our system - we wanted to check whether the outstanding returns have been submitted. Returns must be submitted for all four permits, even if it is a nul return for that quarter.

Can any outstanding returns be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk immediately. Please be sure to submit your quarterly return documents within the grace period given.

Actions from previous CAR forms

I want to be assured that these issues have been addressed:

Ensure waste is stored/treated within permit boundary

Ensure all WEEE is treated within the designated building

Remove the >15mm shredded material from the North area of the yard

Ensure that the most appropriate EWC code is used for each waste

Remove any waste stored outside of the permit boundary that does not comply with any registered exemptions.

Replace and repair the impermeable surface at the top yard

Produce a site drainage plan

Amend the business' Environment Management System accordingly

I look forward to working with the site in the future. 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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CAR_NRW0031735**

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Operator/Permit holder	G L J Recycling Ltd	Date	10/05/2017

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			

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.