

GLJ Recycling Ltd

Site Audit

10th March 2015

Will Powell

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AUDIT REPORT FORM



Part 1: Audit reference information

Permit number	EPR/DB3097TJ EPR/LB3093HH	Site name	GLJ Recycling Ltd
Date(s) of audit	10 th March 2015	CAR ID No.	103080/0237574 103756/0235596
Lead auditor	William Powell	Other auditors	Caitriona Harvey

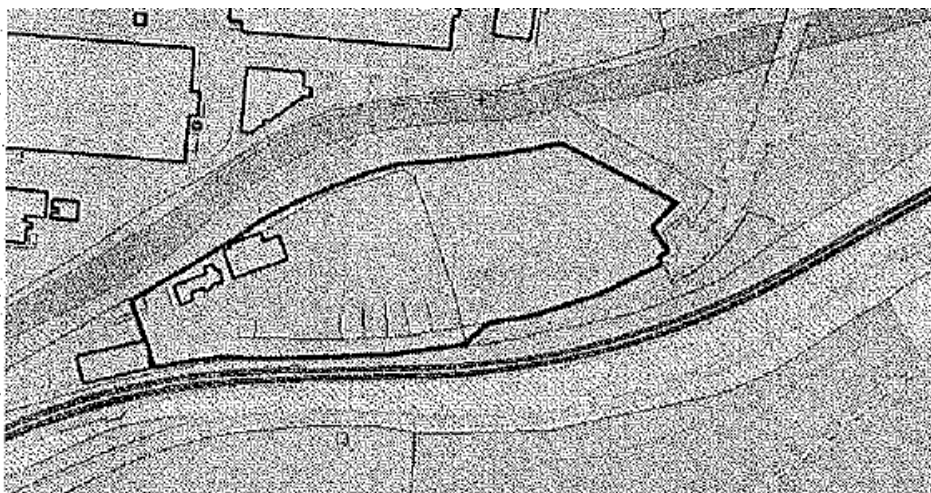
Part 2: Scope of audit

Natural Resources Wales conducted an audit at GLJ Recycling Ltd's permitted site at Cwmcarn; Chapel yard. The audit covered 4 standard rules sets, under two environmental permit numbers:

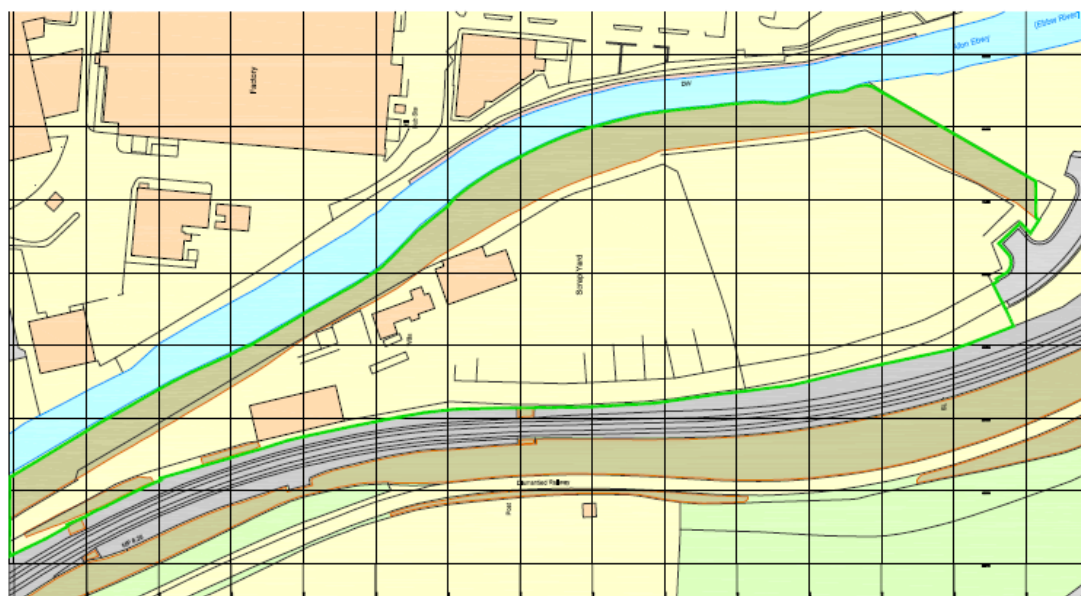
EPR/DB3097TJ	SR2008No20 – Vehicle dismantling SR2008No21 – Metal Recycling
EPR/LB3093HH	SR2008No3 – Transfer Station SR2008No23 – WEEE Recycling

The two permit numbers overlap in area, but do not cover the exact same regions:

The site boundary for the scrap and ELV dismantling rule sets are shown below, with the thick black line highlighting the boundary –



The permit covering rule sets for WEEE dismantling and operating a waste transfer station covers the whole yard –



The audit was intended to cover:

GLJ's **Environment Management System** – how effective it was at ensuring compliance with the permit requirements and associated legislation, how it managed the risks of GLJ's activities, it's ability to aid and instruct staff dealing with a pollution incident, it's plans for an effective maintenance regime and how it ensures continual improvement.

Site infrastructure – including site drainage plans, the site's concrete engineering, and how it is currently inspected and maintained.

Acceptance and control procedures – how GLJ controls the waste coming into site, ensuring that it complies with permit conditions; separation of different waste types such as WEEE, ELVs etc.; the different processes onsite and the environmental controls in place.

Staff training and Awareness – the training that has been provided to deal with day-to-day procedures, environmental awareness, dealing with unpermitted waste types, environmental incidents and emergencies.

Duty of Care – Paperwork filing, waste classification

Part 3: Permit conditions

The table below summarises what permit conditions were audited, areas of non-compliance and suggested corrective action.

CAR Sub-criterion assessed	Permit conditions affected	Comments	CCS Score	Proposed dates for completion
A1	1.1.1; 2.1.1; 2.3.1; 2.4.1; 2.4.2; 2.4.3	Breach of condition 2.4.1 – waste stored outside of the permit boundary	Category 3 breach	TBC
B3	2.3.1; 2.5.1	Breach of condition 2.3.1 – concrete infrastructure cracked and broken	Category 3 breach	TBC
B5	1.1.1	Breach of condition 1.1.1 – shredder breakdown causing backlog of scrap. EMS has not addressed this – see sub-criterion C2	Category 3 breach	TBC
C1	1.1.1; 1.13; 1.1.4; 3.1.1	Breach of condition 1.1.1 & 3.1.1 – Staff training not sufficient to deal with issues - Oil not cleared up after spill. EMS hasn't addressed staff training needs to ensure oil is cleared – see sub-criterion C2	Category 2 breach	TBC
C2	1.1.1	Breach of condition 1.1.1 – EMS is not suitable for purpose	Category 3 breach	TBC
C3	1.1.1; 2.1.1; 2.2.1	High volumes of scrap onsite, but compliant with permit	No breach recorded	n/a
C4	1.1.1; 2.3.1; 2.5.1; 2.5.3; 3.1.3	Breach of condition 2.3.1 – LDAs shredded outside with general scrap	No breach recorded	TBC
D1	1.1.1	Site security compliant	No breach recorded	n/a
D2	1.1.1	Accident planning assessed in part – breach already given under other conditions	No breach recorded	n/a
G2	1.1.2; 4.1.1; 4.3.2	Site records compliant	No breach recorded	n/a
G4	4.1.1	Breach of condition 1.1.1 – Failure to report plant breakdown	Category 4 breach	TBC

Currently the site holds 4 permits, covering scrap metal, End of Life Vehicles and WEEE. During the audit the operators made us aware that they do not operate under the WEEE permit (ref EPR/LB3093HH) though do accept WEEE onto site, though not fridges or televisions.

In the first instance this must be addressed. A meeting is to be arranged with the operators to go through the WEEE permit and explain the requirements fully, though this will be briefly explained in this report. The site must begin compliance with this permit if it is their intention to continue accepting WEEE in any form.

WEEE Permit requirements

The standard rules permit set SR2008 No3 – waste electrical and electronic equipment authorised treatment facility excluding ozone depleting substances does allow GLJ to treat WEEE. An outline of what can and can't be done under the rule set is stated in the introductory note, however in summary:

- This permit only covers for the treatment of WEEE
- No ozone depleting substances can be accepted onsite
- WEEE must be treated using the Best Available Treatment, Recovery, and Recycling Techniques (BATRRRT).
- WEEE treatment must occur inside a building.

Currently GLJ Recycling Ltd will segregate small WEEE items such as SDA. These are taken to a building with a concrete floor. There is no drainage in the building, however the floor is lower than outside, ensuring that the building is bunded. This building roughly meets the conditions for treatment set out in 2.3.1; table 2.3:

1. Treatment of WEEE

- Shall be carried out within a building with a weather proof covering
 - 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.
-

There is a small shredder there that shreds the WEEE so that fragments can be separated into their separate components. Large domestic appliances, washing machines, ovens etc., however do not get shredded within the building, and are put through the main shredder with the general scrap. This is not compliant with the standard rules conditions. If GLJ Recycling intend to continue to shred LDA WEEE then they will need to vary the permit to a bespoke permit.



SDA WEEE shredder inside building

GLJ Recycling Ltd have a policy of not accepting refrigerators and televisions. If this waste material is accidentally accepted then it is quarantined elsewhere.

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. This permit allows the acceptance and treatment of a range of non-hazardous wastes, however the activity must occur within a building and any run-off or discharges must go to a foul sewer or sump.

Currently skips of mixed waste are accepted from customers who have existing scrap metal contracts with GLJ Recycling Ltd. In general, the waste material seen onsite, included wood, plastic, rubble, and plaster. Some sorting occurs here, however mostly it is a bulk and clear operation.

The majority of waste is stored within the building, though there were a few skips stored outside of the building containing wood and plasterboard. Gareth Jones explained that the current building is not suitable to GLJ Recycling's operations. The building is not high enough to get a 360 grabber in without damaging the roof, and tipping often has to occur outside the building, as the raised truck bed will collide with the top of the doors.

GLJ would like to vary the permit to another building that is more suitable, and move their WEEE operations here. The transfer station permit covers the whole yard, however only those buildings that meet the criteria of the permit can operate as a waste transfer station. This means that provided the buildings can meet the criteria of the two permit rule sets, and are suitable for use, the operations could be swapped.



Mixed waste stored inside transfer station building

Scrap and ELV permits: Waste acceptance

The site does operate under both the Scrap metal rules set and the End of Life vehicle rules set under permit EPR/DB3097TJ. Depolluted waste vehicles and general scrap are put through the shredder, to make the separation of fragments of scrap metal easier.

GLJ Recycling still accepts scrap and ELVs from waste carriers and members of the public, however is focussing the scrap business more on large company contracts with vehicle and other steel manufacturers. ELV's are still mostly accepted from members of the public.

A previous depollution audit has found that GLJ has the necessary equipment and training to depollute vehicles received. Where vehicles are received from other ELV Authorised treatment sites, a provision check under the bonnet is made to see if the vehicle has been correctly depolluted. Previous audits of other permitted ELV yards has found that some vehicles are not being fully depolluted – whilst these sites have been given guidance or improvement plans to ensure compliance, it is still important to check ELVs. An undepolluted ELV is considered hazardous waste, and your permit doesn't allow the shredding of such waste.

If any suspicious vehicles are received onsite then operators at GLJ Recycling will contact the local Police for a PNC check.

Infrastructure and maintenance

On the whole the operations on site appeared to be managed well, and significant improvements have been carried out in previous years to the infrastructure and operations. There are some matters which need to be addressed which affect operations under both permits.

These are:

- The impermeable surface at the top end of the site (which contain the ELV operations) needs significant repair. It was explained to us at the time of the audit that new plant is to be installed at this end of the

yard and the surfacing problems will be addressed at the same time. When complete all infrastructure changes will need to be supported by a quality assurance report from an appropriately qualified person showing they are fit for purpose and suitable for operations on site.

- a full site drainage plans needs to be drawn up and provided to NRW, detailing what the current arrangements are on site. We have forwarded to you what plans we had for the drainage on record, but it is likely these are out of date and to not cover the full range of drainage on site



≥15mm Shredded waste stored at North of yard

Shredded waste storage

Waste received at GLJ Recycling is put through a rotary shredder. These fragments are then put through screens including electromagnets and eddy current separator, to remove the majority of metal. The residual waste contains mostly plastic, foam, material and small levels of wood, dirt and rubble. This material is then further screened into two size types; 0-15mm and ≥15mm. There is still some residual metal in the material, and GLJ Recycling Ltd intend to process the material further:

- 0 – 15mm 3-4% metal content
- ≥ 15mm 6-7% metal content.

Currently a ≥15mm pile is stored at the North end of the yard. This area of the yard is not suitable for storage of such material for the following reasons:

- a) This section of the yard is beyond the boundary of the scrap and ELV permit, and is not a permitted waste type under the waste transfer station permit.
- b) There is a planning condition preventing waste being stored in this area
- c) The concrete at this part of the yard is broken, meaning this area would not connect to the sealed drainage system.

Environmental Management System

The site has in place an Environmental management system (EMS), reference EM2000737, dated Nov 2013. Whilst the EMS itself refers to the ISO14001 certification the company has achieved it unfortunately does not cover many of the aspects of the permit which we would expect to see to comply with the permit requirements.

An EMS must meet the criteria 1.1.1 of all your permits:

“The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources”

I would expect the EMS to be supported by a risk assessment which highlights what risks are posed by the regular site operations and incidents or accidents on site. It should explain what day to day operational management steps are in place on site to mitigate those risks. It should explain what steps the site will take to prevent incidents or accidents and what steps will be taken should they occur. Each of these should contain reference to the maintenance and training on site which will provide mitigation of the risks. Furthermore it should clearly show an understanding of what needs to be done to comply with the permit on site, how that fits into the operations on site and vice versa.

The current EMS does not provide that detail. Whilst it gives information on some of the systems you have in place for recording information required by your Environmental policy it does not address directly the site operations.

Whilst you have provided a fire risk assessment, this mostly seems to cover activities within the office and other buildings rather than activities on site. Given the fuel and oil storage on site, and previous history of fires, I would suggest extending the fire risk assessment to all activities onsite. *After the fire at Chapel yard on 10th April, fire officers of the fire and rescue service have also requested this work to be done.*

Whilst the site has equipment in place for dealing with environmental issues, for instance a dust suppression system on the shredder, none of these are listed in your EMS. The asset list does not provide details of systems such as this. An inspection and maintenance regime should be in place for any “environmentally critical” assets, where the breakdown of equipment or plant could cause an impact on the environment.

Where equipment break down on plant such as the shredder, causes a significant backlog with scrap and ELVs, a contingency strategy should be identified within your EMS. This should account for safe storage of scrap metal and other materials, and identify a point when alternative destinations for the incoming material should be sought. At the time of audit the shredder had broken down, causing scrap metal piles to build up in the backlog.

You should consider reading the Guidance in “How to Comply with your Environmental Permit” which gives good guidance on how to more accurately relate your EMS with your permitted operations. Once completed I would expect your staff to have an understanding of your permit and how they can ensure, through their roles, compliance with the permit, and the role the EMS plays in that.

Staff training

Staff training records were shown during the audit, with a training record available for each member of staff. Every member of staff is given environmental awareness training, however there needs to be more training provided on environmental-incident response:

During the audit there was a considerable amount of oil around the shredder and the shearer. After a mechanical breakdown, the gearbox of the shredder had been dismantled, which had resulted in oil spilling on the ground. No effort by operational staff appeared to be being made to clear up the spill. Hydraulic, transmission and engine oils are regarded as hazardous, and if not cleared up, could contaminate other scrap on site, which would result in that scrap being classified as hazardous waste and having to be treated appropriately. Scrap contaminated with oil should be quarantined, as it cannot be shredded with general scrap metal.



Oil spilt from dismantling gear box

A similar situation was occurring with the shearer, which had been drained of oil to aid dismantling. There was oil all around the machine. Much of the concrete here is broken, meaning there is a risk of contaminating the ground with oil.

Staff need to be made aware that any spill of oil should be cleared up. Whilst your drainage may all lead to a sealed sump, with so many breaks and cracks in the concrete it is quite likely that oil will not enter your sealed drainage system.

A month after the audit was undertaken there was a waste fire onsite. During the incident an employee who also works for the retained Fire and Rescue Service in Abercarn was able to advise handling the incident. After the incident however it was clear that if certain members of staff had not be present, then the incident would not have been handled as well. It would be advisable to roll out some more fire incident training, so all staff are aware of how best to act.

EWC codes

You should be aware that the site is limited to accepting and handling the wastes listed in the permits in place. During the audit it was highlighted that some of the scrap metal coming onto site is coming in under 160117 or 160118, when the metal in question does not relate to End of Life Vehicles at all. After seeking advice on this please use 20 01 40 to cover this general scrap metal, where is not connected with End of Life Vehicles. The '20'

category covers waste from commercial and industrial sources and so seems appropriate, however may not apply to all codes. Please see your permit rule set SR2008No21 section 2.2 for a full list of permitted waste types.

You stated during the audit that you have a number of suppliers of depolluted ELVs to your facility, please provide us with a list of those supplying depolluted vehicles for the last 3 months

Waste Returns

Please be aware that you have more than one permit. 2 for Chapel yard and 1 for Crosskeys. Whilst permit EPR/DB3097TJ (scrap and ELVs) allows annual waste returns, your permit EPR/LB3093HH requires quarterly returns. It's important therefore that incoming wastes are coded correctly, so that you can put the correct waste type on the right waste return.

Waste from Viridor, Trident Park

GLJ Recycling Ltd have been receiving waste scrap metal from Viridor's incinerator plant in Trident Park, Cardiff. This waste has come via RGF Haulage via Lamby Way. The waste material has already been screened at Lamby Way to remove the incinerator bottom ash. However the material received at GLJ still contains a proportion of aggregate that is further screened at Chapel Yard.



Incinerator scrap metal stored on site

The scrap metal standard rules set allows you to accept 19.01.02; "ferrous material removed from bottom ash", which would allow the incinerator scrap to be accepted, stored and treated in the open yard. If the material from the incinerator however is too contaminated with aggregate or bottom ash to fit this waste code, then you may be able to accept this under your transfer station permit, however the material will have to be stored and treated within a building.

New rules on hazardous waste

As of June 2015, we will be releasing new guidance on hazardous waste classification. The guidance clarifies that where there is a mirror entry code in the European Waste Catalogue – i.e. could be hazardous or non-hazardous, the onus is on the operator to prove that it is non-hazardous, for example by regular testing (where the inputs can be variable). One of the waste codes affected by this is shredder waste:

- 19.10.03* – fluff-light fraction and dust containing dangerous substances
- 19.10.04 – fluff-light fraction and dust other than those mentioned in 19.10.03
- &
- 19.10.05* – other fractions containing dangerous substances
- 19.10.06 – other fractions other than those mentioned in 19.10.05

Sampling and analysis may need to be performed to show whether this waste is or isn't hazardous. Full information on the new hazardous waste guidance can be found at:

<https://www.gov.uk/government/publications/waste-classification-technical-guidance>

Non permitted activities

There was a quantity of rubble behind the fence at the entrance of the site. You informed us at the time that this was related to the construction of new offices on site. This material either needs to be disposed of appropriately, or, if as suggested, it is to be used by a third party for access to the rail line, then an exemption needs to be registered.



Waste stored in skips outside of permit boundary

There was also waste behind stored in skips in the yard below the entrance. This needs to be removed and not further waste is to be stored in this area. This issue has been raised during previous inspections and should any waste be stored in this area in future, we will consider taking action in line with our enforcement and prosecution policy.

After this audit we recommend the following actions:

- The process for shredding large domestic WEEE is not currently meeting the requirements of the permit, i.e. treated with in a building. Procedures should either be adapted to meet the permit conditions or you will need to vary this to a bespoke permit to cover the activity.
- Ensure GLJ Recycling Ltd can demonstrate that they are working to BATRRT for all WEEE processing
- Remove the >15mm shredded material from the North area of the yard
- Ensure that the most appropriate EWC code is used for each waste, this includes looking into which industry the waste has been acquired from
- Provide Natural Resources Wales with a list of all sites supplying GLJ Recycling with depolluted vehicles
- 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, and provide a quality assurance report from an appropriately qualified person once work has been completed.
- Produce a site drainage plan
- Bring the Environment Management System in line with the “How to Comply With Your Environmental Permit” guidance:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/298102/LIT_7123_79744e.pdf

Including:

- An accident and incident management plan that sets out procedures for staff for dealing with minor spills to major incidents
- Environmental risk assessments for specific site activities: Shredding; ELV dismantling; Shearing; Sorting; storage of scrap; storage of vehicle parts; storage of mixed waste; WEEE storage and treatment. Risk assessment should highlight the controls and limits GLJ have put in place, and include a fire-risk aspect to many activities.
- Inspection and maintenance regime for infrastructure and critical environmental equipment
- Breakdown contingency plan
- Complaints procedure
- Provide clear waste acceptance procedures for all staff to ensure only compliant waste is accepted.

Due to the level of non-compliances onsite, Natural Resources Wales will require a site improvement plan in place to put a timetable for bringing the site into compliance.