

Compliance Assessment Report

Report ID:
CAR_NRW0033584

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

Site	S L Recycling Ltd	Permit Ref	ZB3593HH		
Operator/Permit holder	S L Recycling Limited				
Regime	Waste Operations				
Date of assessment	27/06/2018	Time in	10:30	Out	11:15
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by					
Recipient's name/position	Stacey Lewis, Rebecca Tucker/ Director	Date issued	06/07/2018		

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	
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	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Officer Alex BOWDER attended SL Recycling Ltd at Unit 9 Penallta Industrial Estate, Hengoed at 10:30 on Wednesday 27th June 2018 to carry out a routine inspection of permit **EPR-ZB3593HH** and to assess implementation of the Fire Prevention and Mitigation Plan (FPMP) guidance. Met with business Director Stacey Lewis and TCM Rebecca Tucker who accompanied me around the yard and explained the various site operations and procedures. The weather was hot and dry at the time of visit.

ACTIONS FROM LAST CAR FORM

- Submit outstanding Waste Return document – **Complete**
- Address vehicle stacking principles in the yard (so that units are stored no more than three high) and amend Management Systems to reflect the change - **Complete**

GENERAL OBSERVATIONS

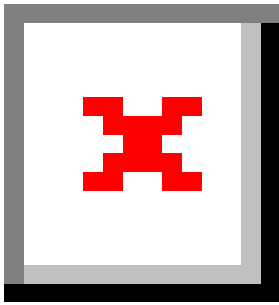
It is evident that site has made vast improvements to operations management since the start of the permit in 2015, which NRW are pleased to see. The business has addressed the factors that contributed to the incident last year and written and implemented Management Systems to ensure compliance with the permit conditions. We discussed the improvements made to operations over the past three years to safeguard against risk of pollution from activities.

TCM Rebecca Tucker has returned to site to assume duties.

The housekeeping on site was very tidy with the various work areas clearly visible and metal types separated. The area to the immediate right of the entrance, where ELVs and loose scrap were stored on last inspection, has been cleared and replaced with skips and compacted ELV shells.

Cutting and shearing of metals takes place within the unit at the back of the site. Any processing is conducted away from flammable materials. Car batteries were stored off the ground in containers with an impermeable base – no treatment of batteries was being carried out, as specified by the permit.

It was mentioned that there are more business vehicles available to aid with the input and output of material from site, which has assisted with managing waste volumes. Sorted metal was bagged ready to leave the site to the west border of the yard. Once segregated, non-metal general waste is stored in a skip temporarily until it goes to landfill for disposal.

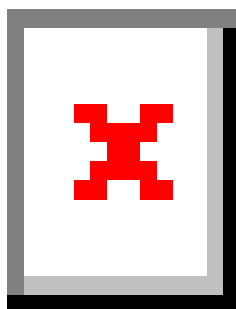


Picture 1 – showing constructed bay walls separating various metal streams

DEPOLLUTION BAY

There was an action to prohibit storage of ELVs more than three high – it was good to see arrangements are being taken on board and implemented cross site. Spill kits present and used if spillages occur.

The tyre storage in this area has improved since the incident last year. Tyres were stored in reasonable stack heights with an established separation distance away from the depollution bay, to prevent risk of any fire spreading. The permit allows no more than 50 tonnes of intact tyres to be stored at any one time.



Picture 2 – showing neat trye storage away from depollution bay

FIRE PREVENTION AND MITIGATION PLAN (FPMP)

SL Recycling Ltd varied their permit **EPR-ZB3593HH** on 25th January 2018 which added the Fire condition 3.5 relating to fire risk mitigation. This requires the operator to manage and operate the activities in accordance with a written Fire Prevention Plan using the current, relevant Fire Prevention Plan guidance.

On 02 April 2018, the business sent through their drafted FPMP document to NRW (issued by Mr Adrian Brian). We have examined the document and cross-referenced the contents with NRW's FPMP assessment criteria. As with the EMS, it should be a live document that is updated accordingly.

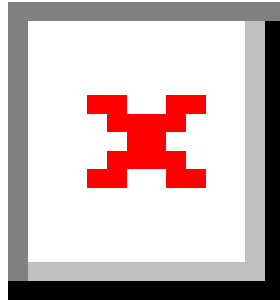
Maximum storage heights

We discussed that the FPMP guidance states that the maximum storage height of stockpiles on site should not exceed **four metres**. This height specification was determined by the Fire and Rescue Service to enable Fire Fighting equipment to extinguish the top of piles, if an incident were to occur.

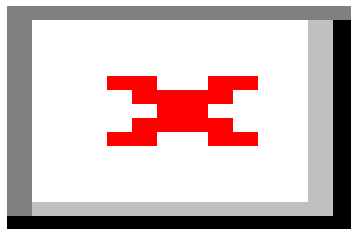
Page four of the your FPMP also states that the maximum storage height for ferrous metals is four metres with a maximum width and depth of 20 metres. The pile was deemed to be larger than this at the time of inspection.

Whilst we understand ferrous metal is not typically highly flammable, it can be coated in elements such as oil or diesel that has the potential to ignite. Therefore, precautions must be made to ensure stack heights are kept as low as possible. If the site can provide evidence to us that show additional monitoring measures are being carried out, along with the with the high turnover rates - this should help mitigate risk.

We questioned the **652 cubic metres** maximum storage volume for ferrous metals and where this calculation came from. Please ensure the relevant separation distances are established from neighbouring waste piles, buildings and boundary fences – so that you are compliant with the FPMP.



Picture 3 – showing ferrous scrap metal pile in yard exceeding 4 metres in height



The maximum time limit for shredded material to be stored on site is three months. Due to the high turnaround of the material, it is never expected to be kept for a period beyond a few weeks.

The quarantine area was identified - it is recognised that these areas have the capacity to store 50% of the volume of the largest waste pile on site. In the event of a fire, this allows the ability to manoeuvre and pull away sections of burning waste for isolation and to extinguish hot points.

INFRASTRUCTURE AND DRAINAGE

No issues found with the yard infrastructure at the time of inspection. We discussed the drainage system on site and the maintenance of the interceptor. NRW recommend that the business should have set dates in place to check the interceptor with additional spot checks throughout the year. This is to ensure the system is functioning efficiently and avoids waiting for the installed alarm system to notify the site.

The allocated bay walls clearly separate the stored metal types which assists in keeping the yard tidy. **Please see the FPMP guidance for storing waste in bays.**

NOISE CONTROL

NRW has recently received a report from Caerphilly Council outlining the noise issues experienced by residents in the local housing estate over the past few weeks. We will investigate these complaints further to establish whether the noise is emanating from the site.

No unreasonable noise noted at the time of inspection.

As the operator you must to ensure you are not operating outside of your working hours and strictly adhere to your opening and closing times.

WASTE RETURN DOCUMENTS

Waste codes all accurate – please be mindful of the tonnage volume 25,000 tonnes per annum, if this is exceeded it will be recorded as a non-compliance.

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

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource 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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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.