

Compliance Assessment Report

Report ID:
CAR_NRW0026326

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	01/09/2016	Time in	12:00	Out	12:45
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by					
Recipient's name/position	Stacey Lewis/ Director	Date issued	05/09/2016		

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	
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	
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

Alex Bowder attended site on Thursday 1st September 2016 at 12:00 to conduct an inspection of SL Recycling Ltd, Unit 9 Penallta Industrial Estate, Hengoed, CF82 7SU. Met with Mr. Stacey Lewis, the weather was warm and dry.

SL Recycling Ltd has been granted the bespoke permit EPR/ZB3593HH for a hazardous and non-hazardous mixed metal waste treatment site and a vehicle depollution and dismantling facility. To inform the company following each visit Natural Resources Wales will produce a Compliance Assessment Report detailing our comments from the inspection/audit. 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 or effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – Very minor incident with no impact.

The site commenced operations around six months ago and is now functioning efficiently. Thank you for taking the time to show me around the site again. The Technically Competent Manager (TCM) for the site has recently left the business and replaced by Rebecca Tucker who is enrolled on WAMITAB course and working towards obtaining the qualification.

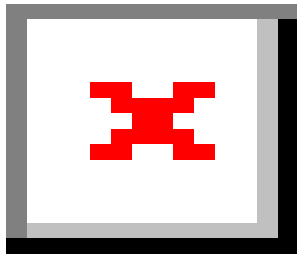
Waste returns

It is your duty under your permit to ensure that the business' waste returns are submitted every quarter without fail. Failure to do so means the permit may be breached for lack of reporting to Natural Resources Wales. It is important that you are using the correct European Waste Catalogue (EWC) codes on your returns; I have sent information and guidance regarding the returns spreadsheet separately. **Please complete these for the quarters you have been operating and send them to us immediately at waste.returns@naturalresourceswales.gov.uk**

Environment Management System (EMS)

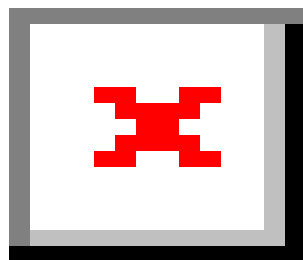
We spoke about an Environment Management System for the site. This should be a live document that outlines how the site will operate in line with your permit and needs to be written immediately. It is referenced as the first condition of your permit under section *Management 1.1.1* - guidance for what should be included has also been sent separately.

The drainage for the site is all under an impermeable concrete surface with a sealed interceptor which is fitted with an alarm. The shredder machine is working efficiently, however it was stated that the machine broke down for a few days which halted the speed of processing and created build-up of the scrap metal pile. We discussed the height of stored metal in the yard, measures must be put in place to ensure the height doesn't not go beyond an unreasonable height and this will need to be clarified in your EMS.



Picture 1 - Showing waste pile stacked in the yard

We also discussed the height of the stacked vehicles and car shells, although the permit does not specify a height restriction one will need to be agreed and stated in your EMS.



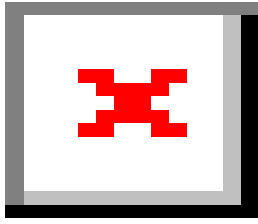
Picture 2 - Showing depolluted car shells stacked five high

Shown the depolluting bay for the ELVs where the various tanks for draining the different vehicle fluids were present. It was stated that Egan Waste Services Ltd take the dirty diesel away from site. Spill kits were present and staff aware of where they were kept.

Tonnage allowance

Your permit states that the total quantity of waste accepted at the whole site shall not exceed 6,000 tonnes in a year. We questioned this tonnage allowance, however in the pre-application stages you advised that the site would be looking to accept approximately 5000 tonnes of ferrous & non-ferrous metals and 1000 tonnes of ELV material.

I suggest you complete the waste return spreadsheets for the time you have been operating and see how far off the 6,000 tonne limit you are. If you feel you will go over this then you will have to look at varying your permit to increase the annual tonnage allowance. This would be classed as a Minor Technical Variation and would come at a fee that is currently £1280 (this may change when new charging scheme guidance is issued).



Picture 3 - Showing spill kit kept in ELV depolluting bay

Non-ferrous metals are sorted inside the building at the north of the site and different metal types were adequately separated in containers/bags. A lot of fire extinguishers witnessed on site, had a contract and mentioned difficulty removing the contents of the canisters. Batteries were stored in appropriate containers and stored on an impermeable surface. The permit does not allow for treatment.

Your permit states no more than 50 tonnes of intact waste vehicles tyres can be stored at any one time – well under that but just bear in mind.

Good overall standard, I look forward to the next visit. If there are any issue please contact Alex Bowder on 0300 065 3394. 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			

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.