

**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	05/09/2017	Time in	11:00	Out 11:30
Assessment type	Site Inspection			
Parts of the permit assessed	All			
Lead officer's name	Bowder, Alex			
Accompanied by	Birch, Jacob			
Recipient's name/position	Stacey Lewis/ Director	Date issued	13/10/2017	

### 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	
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	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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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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 Jacob BIRCH carried out a routine inspection on Tuesday 5<sup>th</sup> September 2017 at 11:00 at SL Recycling Ltd, Unit 9 Penallta Industrial Estate, Hengoed - Permit number **EPR-ZB3593HH**. Met with company Director Mr. Stacey Lewis and site Technically Competent Manager Becky Tucker. The weather was warm and mild at the time of inspection.

### Actions from last CAR form

- Submit permit variation application - The site is in the process of submitting the application to NRW.
- Amend EMS – This is being done accordingly
- Develop a Fire Prevention Mitigation Plan – **This needs to be created immediately**

### Noise Prevention Plan

**ACTION:** we require the business to produce a Noise Prevention Plan. There is a condition in your permit which requires you to take appropriate measures to prevent or minimise noise. The measures required need to be what are reasonable, good practice and balances the costs and benefits to prevent or minimise noise.

We expect any standards of industry good practice to be met along with any recommendations in our guidance. If there are noise problems at your site, and you have already implemented some measures, there may be a case to justify further measures or restriction of the activity, depending on the severity of the problem and the cost.

Even if you are following normal standards and guidance but the impact is unreasonable, then you will have put in place further measures and we will judge with you what is reasonable and to what extent further measures are possible, required or justified.

**Your plan must demonstrate the measures you will employ and how you will respond to prevent or minimise the noise.**

Having a noise management plan that sets out several measures you will take will not necessarily mean you will comply with this condition. Your obligation is to prevent the noise or use all appropriate measure to prevent a noise that amounts to pollution from your activities. You may need to update this plan with further measures to ensure that the condition continues to be met.

Appropriate measures to reduce/control noise include:

- monitoring noise levels at different places and times to find where the problem is coming from
- maintaining equipment specifically to reduce noise levels, for example balancing fans and fixing loose

covers

- enclosure or abatement, for example acoustic enclosures, silencers, keeping doors and other openings in buildings closed
- timing, for example avoiding noisy work during evenings and weekends
- siting away from sensitive receptors, for example of delivery or vehicle routes or noisy plant
- switching off plant, vehicles and ventilation units when not in use
- reducing or stopping your activities that are causing the noise until either the circumstances have changed or other appropriate measures have been put in place to allow the operations to re-commence without significant noise.

#### Fire risk

Tyres stacked in the corner of the yard need better site management. Please ensure access is available to reach the storage area if a fire did occur etc.

#### **Contingency Plans**

It became apparent that the site has limited contingency plans for when machinery breaks down. If the machinery cannot be fixed for an extended period, you must decide what interim measures would be put in place to prevent excessive build-up of materials. **These must be included in your EMS.**

#### **Interceptor alarm**

Please ensure there is a clear pathway so that this can be accessed if a blockage occurs. The interceptor does not collect 100% of all contaminants that goes through it, coolant for instance.

The site should not rely on the alarm to notify the business once the system is full. Alarms can stop working which can go undetected and so the site should be more regimented with checking start of every week etc.

Stacking of car shells – state in your EMS how they are stacked and maximum storage heights. Waste streams were adequately separated in bays at the time of inspection. Ferrous and non-ferrous metals in the unit and clearly identifiable.

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

Thank you.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0032296**

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Site	S L Recycling Ltd	Permit Ref	ZB3593HH
Operator/Permit holder	S L Recycling Limited	Date	05/09/2017

### 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](mailto: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.