

Compliance Assessment Report CAR_NRW0039727

Permit being assessed: ZB3593HH.

For: S L Recycling Ltd, held by S L Recycling Limited

At: Unit 9, Penallta Industrial Estate, Penallta, Hengoed, Caerphilly, CF82 7SU.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 06/04/2022 between 12:00 and 12:30.

Parts of permit assessed: A, B, C, D, F, G

NRW Lead Officer: Alex Bowder, accompanied by Greg Gardner.

Report sent to: Becky Tucker, Stacey Lewis, Gareth Danter-Hill, Technically Competent Manager, Business Director and Environmental Consultant on 20/04/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
G4	Ensure that catalytic converters are given the appropriate hazardous EWC coding when accepted to and removed from site. Advice and guidance provided to the operator separately.	26/04/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This compliance report details the site inspection conducted by Natural Resources Wales (NRW) Officers on 6 April 2022 at S L Recycling Limited, Unit 9, Penallta Ind Est, Hengoed CF82 7SU - Permit number EPR-EPR-ZB3593HH.

Senior Regulation Officer Alex BOWDER and Officer Greg GARDNER attended S L Recycling Limited at 10:30 to conduct the Quarter 1 inspection for the new compliance year 2022-23. Becky TUCKER (Technically Competent Manager), Ryan HILL (Site Manager) and Environmental Focus Consultant Gareth DANTER-HILL accompanied Officers around the permitted area. Weather conditions were wet and overcast at the time of inspection.

ACTIONS FROM LAST VISIT - 2 SEPTEMBER 2021

- Service site drainage infrastructure and interceptor system - **COMPLETE**
- Manage waste volumes within the permit boundary to:
 - (1) maintain compliant stockpile sizes and (2) keep an appropriate quarantine area on site - **COMPLETE**

WASTE ACTIVITIES AND PERMIT COMPLIANCE

This was the first inspection since the waste fire incident that was experienced in September 2021. It was encouraging to see that the operator has made efforts to service the interceptor system and address the waste management issues that were highlighted in the last CAR Form CAR_NRW0038774.

There were no non-compliances noted with regard to waste storage across the permitted area. The stockpile height was at a complaint level which provided ample room for the manoeuvring of vehicles - this was stated to be the sustained practise going forward. Housekeeping throughout the yard was generally quite orderly; Officers commented that this was an improvement on the waste stream management.



No issues were noted with the drain slots or the interceptor system across the yard. Questions were asked as to how often the system is serviced and what measures are in place to check that the system is functioning. Small patches of weakened flooring were highlighted which were said to be scheduled for repair later in the year - an advisory note to monitor.

No condition breaches were scored against the permit on this inspection.

METAL RECYCLING

The metal shearer used for the fabrication treatment process has been removed from site. This site is now used primarily as a storage location before wastes are transported to the operator's New Inn site for treatment.

The primary waste metal stockpile stored centrally within the yard was compliant in terms of its overall volume and dimension; this was, again, good to see. Officers stated to endeavour keeping the waste storage volumes at this manageable level going forward. Various metal types are removed and separated within the work shed, and then placed in containers ready for removal. To the east of the site entrance, Lego block style bays have been placed to separate metal streams. This is historically where the ELVs were stored prior to depollution.



END-OF-LIFE VEHICLE DEPOLLUTION

There were no issues noted with the depollution bay and vehicle storage area. There were notably less vehicle shells stored towards the eastern site boundary. All work was being carried out within the designated shelter and the stacking/storage of shells was generally being managed well. Extracted hazardous elements such as oils and fuels were being appropriately stored ready for removal via an appropriate contractor. Extracted vehicle batteries were stored in a container ready for removal from site.

Removed tyres were stored in a reasonable volume and are sent to an appropriate facility in bulk for disposal.

Catalytic Converters

Recent advice and guidance was issued to the operator with regard to the hazardous nature of catalytic converters and providing the correct consignment. Catalytic converters can contain RCF which must be classified and consigned as hazardous waste using the waste code **16 01 21***, along with an appropriate description - for instance, waste catalytic converter containing RCF matting.

The site must always ensure that this waste type is given the appropriate hazardous coding when accepted to and removed from site.

Later in the year, NRW intend to conduct a review and audit of the operator's Fire Prevention and Mitigation Plan.

If you have any issues with this report, please contact Senior Regulation Officer Alex BOWDER at Alex.Bowder@cyfoethnaturiolcymru.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

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.