

Compliance Assessment Report CAR_NRW0040071

Permit being assessed: AB3698ZE.

For: Mekatek Ltd, held by Mekatek Limited

At: Unit C, Maerdy Industrial estate (South), Rhymney, Caerphilly, NP22 5PH.

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

On 21/06/2022 between 12:00 and 13:05.

Parts of permit assessed: Conditions 1, 2, 3

NRW Lead Officer: Jak Rose, accompanied by Alex Bowder.

Report sent to: Daniel Lewis, Peter Ryall, Technical Compliance Director, Senior Compliance Officer on 30/06/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	

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
C2	Review the activities that you are undertaking as part of the waste exemptions you have registered at the site.	30/09/2022

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 21 June 2022 at: Mekatek Ltd, Unit C, Maerdy Industrial Estate (South), Rhymney, NP22 5PH - Permit

number **EPR-AB3698ZE**

Waste Regulation Officers Jak ROSE and Senior Officer Alex BOWDER Arrived at site 12:00 and met with Daniel LEWIS, Technical Compliance Director and Peter RYALL, Senior Compliance Officer. The last inspection was completed on 20 November 2018. It was requested that an entire site walk around was undertaken. The weather conditions were warm and dry during the time of inspection.

Officers walked through the offices and into the main building. Officers and staff were all advised to wear PPE throughout which included ear defenders to be worn in the processing areas.

Vehicles approach the weigh bridge and then enter via the main roller/shutter door into the loading unloading area of the building.

Officers were shown various bays and containers such as cathode ray tube equipment which because of its reduced usage is bulked up prior to collection.

There were bays such as white goods which are bulked up prior to collection and waste recovery.

Photo 1 – white goods awaiting to be transported, these are not degassed on site.



There is an initial sort after the wastes are received on the other side of the building which is dedicated for Waste Electrical and Electronic Equipment (WEEE) It then goes through an initial sort.

Officers were taken to the dismantling and picking station in which staff were seen disassembling various WEEE.

Photo 2 (below) – dismantling and picking station for WEEE (stage 2 and stage 3 of processing)



Photo 3 (below) – shredder which was not in operation during inspection



Officers were shown the shredding plant for the cabling. This was operational at the time, with a member of staff loading the conveyer. The system is specified to process 1 tonne per hour of cable. The processed cable is stored within bags before being exported off site.

Photo 4 (below) – employee feeding the cable granulation system

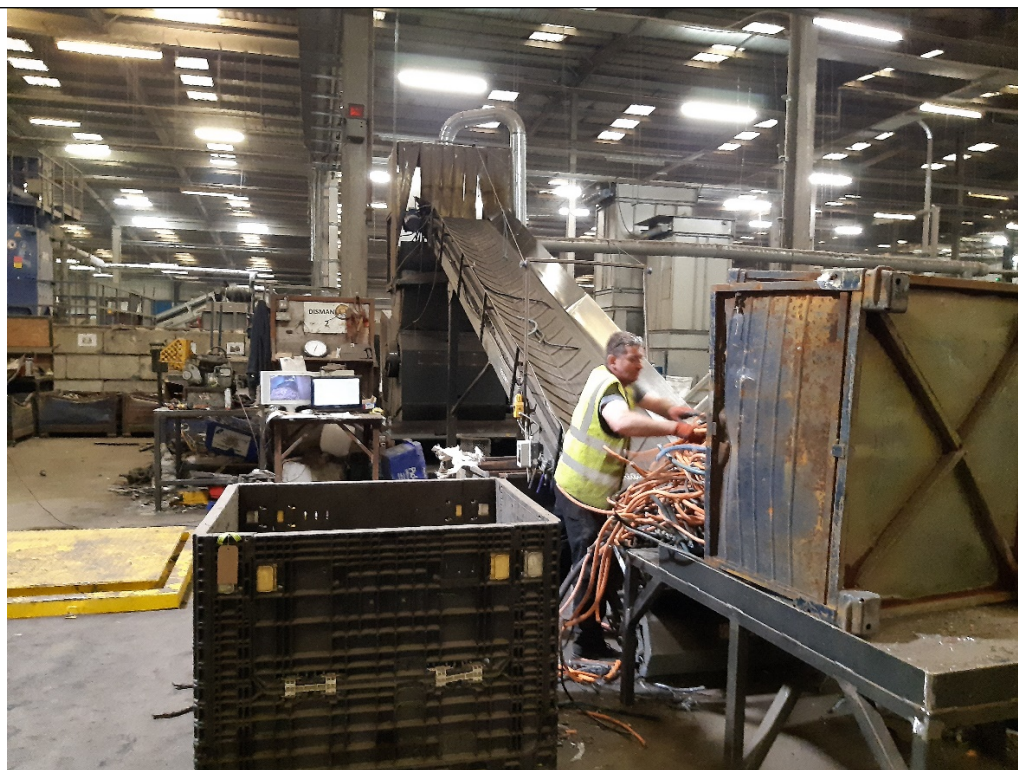


Photo 5 (below) – An electrostatic separator has been installed to separate conductive and non-conductive materials (less than 10mm)



Waste Returns

All returns are up to date. These will be looked at in further detail by the time the next inspection is due.

Fire Prevention Management Plan (FPMP)

The current FPMP for the site may need reviewing, the latest version we have on file is from 2017. Within the FPMP it states bales will not be stored more than 4m high. As far as practically possible, bales will be stacked in a manner that avoids the potential of energetic airflows between the bales.

Advisory – within the temporary storage bunker there was baled cardboard that appeared to be higher than the FPMP guidance suggests. Please reduce these as necessary.

Site Drainage

There is no drainage system within the main building.

Technically Competent Manager (TCM)

The certificates for the TCM are within the dates. Daniel LEWIS' certification is due to expire September 2022.

Site Security

There have been no reported thefts or break ins reported.

C2 – Management system and operating procedures - Waste Exemptions T4 and T9

It was raised during the inspection that there are waste exemptions registered alongside the waste permit. These exemptions are: T9 (ref: **NRW-WME069353**) and T4 (**NRW-WME069356**) These were both registered on the same date.

Where there is more than one exemption registered at a place, they should be clearly discrete, and the operator must be able to demonstrate which registration or permission covers which activity and which waste material.

You have provided a site map which indicates the area in which these exemptions are located. At present the activities seem very similar and we are unclear why the exemptions are needed.

You have explained that the exemptions complement your existing processing capability. The permit already includes associated treatment and storage, therefore volumes on site cannot be 'bulked-up' by registering exemptions which allow further treatment and storage.

Within *Schedule 1* of the permit lists the activities which are closely related to the ones within the exemption.

ACTION: Review the activities that you are undertaking as part of the waste exemptions you have registered at the site.

Deadline: 30 September 2022

Officers then walked out of the building and into the skip storage area. It was observed that some cracking of the concrete flooring was visible. It was noted that maintenance works to the yard area is being planned in due course.

The drain next to the cracked area appears to be completely blocked. Officers were advised that there are no issues in relation to the drainage of surface water to the yard.

Photo 6 – concrete cracking and surface water drain blocked by sediment



The rest of the yard area appeared to be in generally good condition. the storage of wooden pallets which are stored before being collected and transferred off site are taken to Southwest Wood Products.

The empty skip storage area was tidy with no litter leaving the site boundary.

Officers left at 13:05

If you have any issues with this report, please contact Waste Regulation Officer Jak ROSE at jak.rose@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.