

Compliance Assessment Report CAR_NRW0040270

Permit being assessed: PP3993VS.

For: Atlantic Recycling Limited, held by Atlantic Recycling Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EJ.

Type of assessment carried out: Audit, Reason: Routine.

On 27/09/2022 between 10:00 and 12:00.

Parts of permit assessed: Improvement Conditions

NRW Lead Officer: Lewis Evans, accompanied by Andi Kemp.

Report sent to: David Neal, Director on 17/10/2022.

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)	

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?

No action required.

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

Atlantic Recycling Limited – Visit 27th September

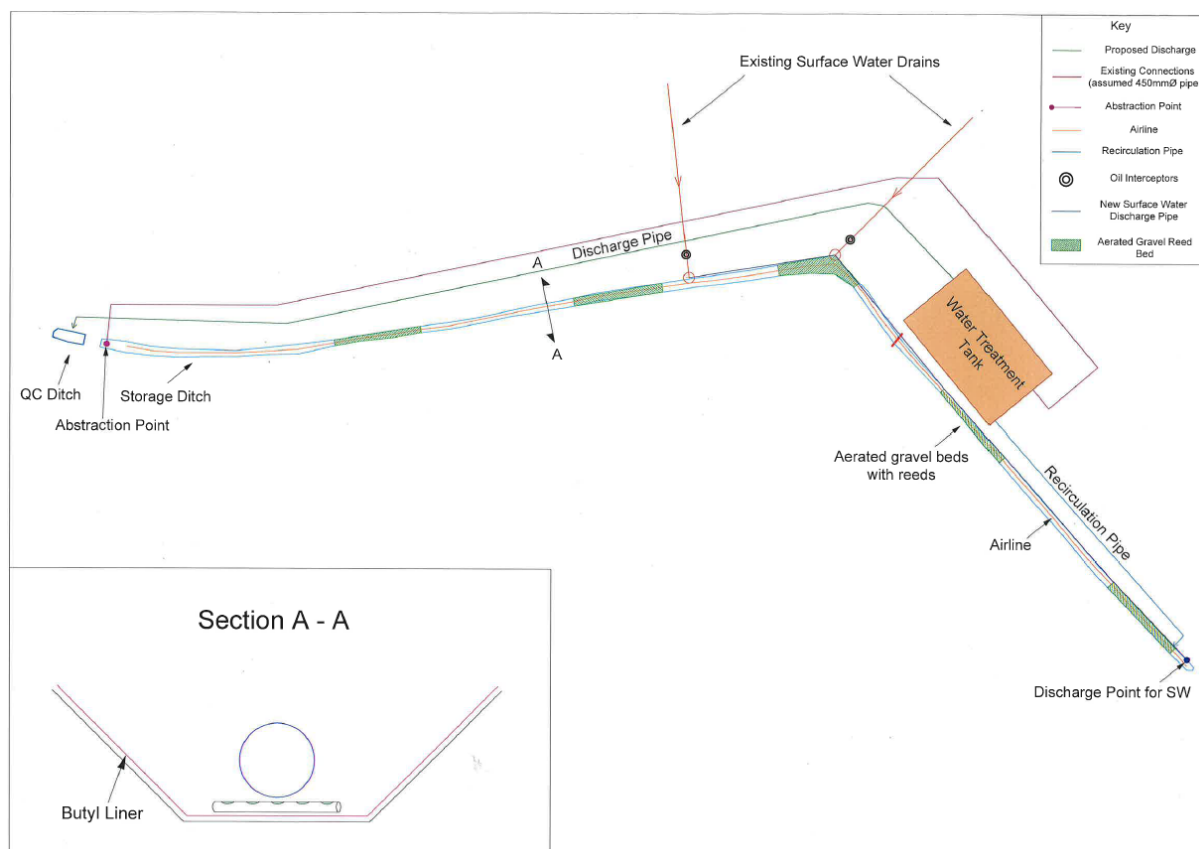
Senior Industry Regulation Officer Lewis Evans was accompanied by Andi Kemp on the visit to Atlantic Recycling Limited (ARL) on the 27th of September. From ARL was Dr Ahlim Hashm and David Neal. Also present were representatives from Decus, Stephen Whitehouse and Robert Prigmore. Decus been brought in as a consultant for ARL and have completed the report titled “Atlantic Recycling Surface Water Management Review June 2022” further.

The main purpose of the visit was to further discuss the report and for us to go onto site to inspect the current arrangements and infrastructure and to assess the future proposals of the water treatment system, and to close out Improvement Condition 2 which is stated in table S1.3 in the environmental permit as follows:

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
1	Submit the relevant section(s) of the updated management system (required in condition 1.1.1) for the soil and aggregate processing activity to demonstrate how you will comply with the updated, outcome focused conditions in the consolidated permit, in particular, condition 1.2 - Avoidance, recovery and disposal of wastes produced by the activities. The updated Environmental Management System should include information on, but not limited to: - detailed process descriptions of the activity - suitability of the wastes to be treated via the prescribed method - how wastes that are deemed unsuitable to be treated via the prescribed method will be processed through the site - pollution prevention measures - how the wastes are tracked and monitored whilst on site and undergoing treatment - reporting process for confirming end of waste status for each process product recovered for re-use on or off site.	Completed
2	The operator shall submit to Natural Resources Wales proposals for the operation of the Water Treatment Plant with regard to effective operations and water process temperatures. To be implemented by the operator upon approval by Natural Natural Resources Wales.	31/01/2021 or other date agreed in writing with NRW

We were informed that no water has flowed from the storage ditch over the weir into the quality control ditch since 2016 because water has been sprayed onto the waste piles on site. The existing drainage system on site uses trash screen and interceptors to remove any large particle objects before flowing to the storage ditch. This was confirmed as no waste material was observed in the ditches on the walkover.



Picture 1 - Image of the proposed pipework for the water treatment system.

During the discussions on the drainage proposal, the Decus employees handed out the above image (in A3 format) so it was easier to read and to clarify the changes. Firstly a new surface water discharge pipe will run along the ditch, taking water on site to the head of the ditch marked “Discharge Point for SW”. Once here, the water will flow down the storage ditch going through aerobic and anaerobic

areas to aid the conversion of ammonia to nitrogen. The aerated gravel beds will have an airline running along the ditch and will be providing air to the ditch as seen in the cross-section A-A in the bottom left hand side of Picture 1. Once the water has reached the end of the ditch, there will be an abstraction point taking the water up to the water treatment tanks for further treatment. From here, there are two exit points for the water to go, one being forward onto the quality control ditch and the other to be recirculated back to the top of the storage ditch to run through the storage ditch. This will be done during dry weather periods where water will need to be kept in the ditch to stop it drying up. At the bottom of the storage ditch there will be a pump to transfer the water from the storage ditch to the QC ditch.

For ARL to get a good understanding of the system, the monitoring regime that is proposed is on page 10 and 11 of the report and will be completed by ARL as set out in the report. As seen in the permit, these results must be submitted to NRW on a monthly basis for NRW to review. As detailed in the report, after 12 months of monitoring has been completed there will be a review of the results. Any deviation from the monitoring results will depend on the results throughout the year and will need to be agreed in writing with NRW prior. It is also worth mentioning that the frequencies for certain parameters cannot exceed those set out in the Waste Treatment BREF.

After reviewing the report and attending site, NRW are happy with the proposals made in the report and Improvement Condition 2 has now been signed off. From the email received from ARL on Thursday 29th of September, it is expected that the implementation of the water treatment plant will commence in Spring 2023. Please keep NRW informed of any progress/delays with this.

END.

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.