

Compliance Assessment Report CAR_NRW0041236

Permit being assessed: VP3095FS.

For: Soil and Aggregates Treatment Plant, held by Neal Soil Suppliers Ltd

At: Atlantic Ecopark, Newton Road, Rumney, Cardiff, CF3 2EJ.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Lewis Evans.

Report sent to: Gavin Powell, Technical Assessment Chemist on 17/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Neal Soil Suppliers Limited

Permit Reference: VP3095FS

Neal Soil Suppliers Limited (hereafter Neals) submitted their annual report to Natural Resources Wales (NRW) to satisfy permit condition 4.2.2 which sets out the following:

“For the following activities referenced in schedule 1, table S1.1 (A1 to A3), a report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production / treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

This was submitted on the 9th of January 2022 which was within the deadline set in the permit condition above. Also included in the report are the following reports; Water Usage, Energy Usage, Raw Materials and Performance Indicators.

Waste Returns

Waste returns from Neals were submitted to NRW on time and have been accepted.

Performance Reports

- Energy Usage

The site used 119,296 litres of diesel was used by the sites generators in 2022. This is down 33,018 litres from 2021. This coverts to 1,262.15kWh of electrical energy.

- Water Usage

There was no water imported to this site for the year 2022, this is due to the wash plant working in a closed loop system. Additional comments from the site have stated that additional water has been obtained from the ditches on site to be used in the Wash Plant.

• **Performance Parameters**

The following table shows the total treated materials on site in 2022.

Parameter	Units
Treated Non-Hazardous	170,000 Tonnes
Treated Hazardous	70,000 Tonnes
Aggregates Recovered	160,000 Tonnes

• **Raw Materials**

The raw materials include both the waste materials treated in the wash plant throughout the year and those virgin raw materials used on site as part of the process. A total of 245,820 tonnes of waste material was processed in the wash plant, 25,820 tonnes (~10.5 % of the total) were hazardous while the remaining 220,000 tonnes were non-hazardous. The following materials were used in the washing process: -

DFloc 331 – 6600kg

DFloc 5278 – 6000kg

D-Sperse PE58 – 3000kg

DFloc 335 – 3000kg

Sulphuric Acid – 4800kg

Light Sludge

Approximately 101.04 tonnes of this sludge were produced in 2022, all of which were sent out to “Tradebe UK” for disposal as hazardous waste. Neals provided scans of the disposal tickets for the sludges in Appendix B of the report. Production of light sludge has increased from 71.28tonnes to 101.04tonnes in 2022 from 2021.

Light Debris

Although not listed in the above discussed report, the wash plant also produces another fraction. This is collected as debris from the trash screen and usually contains

light fractions of materials such as light plastics, paper, and balls of polystyrene, etc.

This is usually collected and sent to Atlantic as combustible material capable of being recovered in the RDF production process. A total of 2655.338 tonnes were removed of the site during 2022 to the adjacent Atlantic Recycling Limited site as shown in the waste transfer note provided in Appendix C.

Recovery Efficiency

Neals have calculated the efficiency, as previously proposed, from the ratio of recovered quantities to the total quantity of treated waste on annual basis. A total of 240,000 tonnes (70,000 tonnes Hazardous and 170,000 tonnes Non Hazardous) were processed in the wash plant during 2022. The total quantity of disposed material including the light sludge (101.04 tonnes) and the light debris (2655.338) is approximately 2756.4 tonnes with the remaining 237,243.6 tonnes, either have been or are in the process of being recycled, an efficiency of approximately 98.55%. In fact, although the light debris is removed to the Atlantic site as waste, it is mostly recovered as a fuel after further processing at the Atlantic site.

Other Recoverable materials include:

- 160,000 tonnes of sand and aggregates
- 75,000 tonnes of filter cake.
- 839.14 tonnes of ferrous metal
- 10.4 tonnes of non-ferrous metals were recovered for recycling.

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.