

Compliance Assessment Report CAR_NRW0041490

Permit being assessed: BB3397CT.

For: Green Metal Salvage Ltd, held by Green Metal Salvage Ltd

At: Unit 6 Millbrook Ind Est, Siloh Road, Landore, Swansea, SA1 2NT.

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

On 06/03/2023 between 12:00 and 13:15.

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

NRW Lead Officer: David Morgan.

Report sent to: Mark Tymkiv, Technical Competent Manager on 07/03/2023.

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)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	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

A routine site inspection was undertaken on Monday 6th March 2023. Present at the time of the visit were: David Morgan (Natural Resources Wales), Carl Locke (GMS Ltd) and Mark Tymkiv (representing GMS Ltd).

An inspection of the yard was undertaken and the following observations were made:

Site Boundary

An inspection of the site boundary wall was undertaken. In the left corner (upon entering through main gates) of the site, a small section of the boundary wall was missing. The missing section, at the top of the wall, will need to be replaced in order to prevent escape of waste from site (can potentially occur when loading). The boundary wall, if maintained sufficiently, will also help to ensure unauthorised access on to site.

Generally, although the site is relatively small in size, the throughput of waste is significant for the layout of the site. Please undertake checks of the other sections of the boundary wall that were not accessible during the inspection and repair any damage.

Areas to the rear of the site, behind the boundary wall, were not accessible during the inspection. Please ensure regular checks are undertaken and that any waste that has potentially escaped site during the loading process is brought back on to site. It is likely that officers will inspect these areas in a future inspection.

Site Infrastructure

It is noted that the site surface is uneven and that crushed concrete/brick has been brought on to site to protect the site surface when loading as the concrete surface can be damaged with plant and vehicles tracking over the site.

Please ensure that regular checks are undertaken so the site surface is maintained to a suitable level. While on site, we discussed routinely changing the layout of operations in the yard so that different sections of site surface can be left free from waste and these sections can be repaired when necessary.

Waste Storage

It is noted that the yard is within the boundary of the Environmental Permit and depolluted vehicles can be stored outside. You must ensure activities related to the Environmental Permit are kept separate from the activities taking place under the T9 Waste Exemption (Scrap Metal) activities.

End-of-Life Vehicle Depollution

Vehicles outside in the yard had been depolluted. Although depollution was not in progress while the inspection took place, written depollution records were provided for inspection

and these were then matched against the Certificates of Destruction (COD's).

Environmental Permit & Environment Management System

It is understood that following some staff changes, Carl Locke is now the Site Manager and manages day to day operations. Daily Inspection Checklists completed by the Technical Competent Manager were viewed. Checklists did identify issues arising on site such as the need to check boundary walls and site surfaces etc. Please ensure these observations are actioned to continue compliance with the Environmental Permit.

A copy of the Environmental Permit, Environment Management System and Fire Prevention and Mitigation Plan (FPMP) were available on site and were presented when requested.

ACTION: Following recent staff changes, and continued works to infrastructure (boundary walls), you should consider revising the Environment Management System and FPMP.

ACTION: It was agreed that the TCM would deliver refresher training on these documents via onsite 'toolbox talks'. This training should cover the responsibilities under the Environmental Permit and procedures for dealing with any potential accidents and emergencies on site.

Summary

No non-compliances were recorded against the Environmental Permit. Some attention needs to be paid to maintaining and repairing site infrastructure (boundary wall and site surface).

Please ensure refresher training is undertaken so all staff on site are made aware of their responsibilities in relation to achieving compliance with the Environmental Permit.

Thank you for your time during the inspection.

END OF REPORT

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.