Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0041620

Permit being assessed: KP3636HB. For: The Recycling Centre EPR/KP3636HB, held by Egan Waste Services Limited At: Egan Waste Services Recycling Centre Unit A15 Treforest Industrial Estate , Pontypridd, CF37 5TA. **Type of assessment carried out:** Report/Data Review, Reason: Routine. On 24/03/2023 - 29/03/2023 between 10:00 and 12:00. Parts of permit assessed: Improvement conditions **NRW Lead Officer:** Mostyn Wall. **Report sent to**: Gareth Jones, Site Manager on 29/03/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	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
A1	IC 1. Update the FPMP to be fully compliant with the IC 1. IC4: Action: Egan Waste to sample for missing parameters to complete the emission to sewer inventory. IC8. Action: Repair the impermeable surface and get sign off from construction by a Certified Quality Auditor to show that it meets BAT. Action site to send inspection procedure for the oil pit.	31/05/2023

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.

<u>**At this time, we do not intend to take any further action.**</u>

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

Mostyn Wall visited Egan Waste on the 24.03.2023 to discuss the permits improvement conditions and inspect the sites impermeable surface.

A discussion was had on the improvement conditions (IC), the site has submitted documentation for all the IC's and Egan Waste has made significant improvements to their environmental management system. NRW recognises the significant amount of work done by the site to meet the various IC's.

Each IC is discussed below and remaining actions are highlighted.

IC 1. Fire prevention and mitigation plan

The FPMP is a good document that follows the NRW guidance. Further information is required, especially the water management during a fire. Updates to the maps and plans are required to make them clearer for the fire service to read and understand.

Actions:

Section 2.0 Preventing fires

Please add in the details of the annual scheduled testing. Does Egan Waste undertake fire drills?

Section 2.1 Pile size, volume and dimensions

Add dimensions of the 40 yard roll off skips to the appendix, length, width, depth and height. Detail the distances between each pile or skip.

Section 2.18 Reactions of Incompatible Materials and Non-Compliant Wastes

Does Egan Waste have a visual library or training to identify different battery types?
This is not needed as part of the fire plan but should be in the staff training. Can Egan Waste operatives identify electric vehicle, electric cycle, laptop, industrial use batteries so that they can be isolated?

Section 3.2 Water Supply and Management

Water supply

- Confirm that Egan Waste has an agreement with DCWW to use the fire hydrant adjacent to PB Gelatines
- Contact DCWW or fire service about the use of the hydrant
- Update plan if DCWW have any protocol prior to the use of the hydrant

Tanker vehicles used to suck away fire water.

- Total capacity of tanker vehicles for fire water storage/removal or re-circulation. List tanker capacity under section 2.7 as well.

How is fire water prevented from entering the local rivers & groundwater? What if the interceptor is full, where does the water go?

- How is fire water prevented from entering local rivers and storm drains
- Plan for water leaving the site if the interceptor is full.
- If you plan to divert fire water to your local sewers. You will need agreement in principle from the sewerage company before including this measure in your fire prevention plan (evidence of approval will need to be submitted in the plan)

FPMP Appendix

Show on the maps

- Location of drain covers and any pollution control features such as drain closure valves and firewater containment systems
- Drainage systems, foul and surface water drains, and their direction of flow and outfall points

IC 2. BAT 1. EMS

- *VII. following the development of cleaner technologies*

Egan Waste has added this as part of the yearly ISO 14001 and ISO 9001 Integrated Management Review

- *VIII consideration for the environmental impacts from the eventual decommissioning of the plant at the stage of designing a new plant, and throughout its operating life*

Added as an agenda item to the ISO 14001 and ISO 9001 Integrated Management Review

- *IX. application of sectoral benchmarking on a regular basis*

Added as ISO 14001 and ISO 9001 Integrated Management Review. Egan Waste is using HSE sector data to benchmark against.

- *X. waste stream management* (see BAT 2)
- *XI. an inventory of waste water and waste gas streams* (see BAT 3)
- *XII. residues management plan (see description in Section 6.5)*

Egan Waste has submitted an EMS document and flow chart outlining the pre-treatment process for oil waste.

- XIV. Odour Management Plan (BAT 12)

An odour management plan is now included in the EMS.

- XV. Noise and Vibration Management Plan (BAT 17)

Egan Waste has stated that XV. Noise and vibration management plan is not applicable to the site. NRW confirms following a visit that a noise and vibration plan is not needed and there have been no noise complaints at the site.

This completes the improvement condition.

IC 3 BAT 2.

- *Set up and implement waste characterisation & pre-acceptance procedures*

Egan Waste has submitted pre-acceptance overview document and guidelines that is included in the EMS. This meets the IC requirements.

- *Set up and implement waste acceptance procedures*

Egan Waste has submitted a site EMS waste acceptance procedure.

Action: Add into the waste acceptance procedure a check of the waste code to see if the installation is permitted to accept the incoming EWC code.

- *Set up and implement a waste tracking system & inventory*

Egan Waste has submitted a waste tracking EMS procedure for waste tracking, waste storage and waste destination tracking. This meets the IC requirements.

- *Set up and implement an output quality management system – not applicable to the site – check.*

Egan Waste has sent in EMS documentation showing the sites output and movement of waste off the site. This meets the IC requirements

- *Ensure waste segregation*

Egan Waste has submitted EMS documents and flow diagrams showing how waste is sorted and segregated at the site. This meets the IC requirements.

- *Ensure waste compatibility prior to mixing or blending*

Egan Waste has submitted a flow diagram showing how waste compatibility is undertaken at the installation. This meets the IC requirements

- *Sort solid incoming waste – S6.4*

Egan Waste has submitted a flow diagram showing how solid waste is sorted at the installation. This meets the IC requirements

IC 4 BAT 3. Establish and to maintain an inventory of waste water and waste gas streams to facilitate the reduction of emissions to water and air

Parameter	Limit	Monitoring Frequency	Samples submitted
Adsorbable organically bound halogens (AOX)	1 mg/l	None specified	No
Benzene, toluene, ethylbenzene, xylene (BTEX)	None set	Once every month	No
Free cyanide (CN-)	0.1 mg/l	Once every day	Yes
Hydrocarbon oil index (HOI)	10 mg/l	Once every day	No
Arsenic (As)	0.1 mg/l	Once every day	No
Cadmium (Cd)	0.1 mg/l	Once every day	No
Chromium (Cr)	0.3 mg/l	Once every day	Yes
Copper (Cu)	0.5 mg/l	Once every day	Yes
Nickel (Ni)	1 mg/l	Once every day	Yes

Lead (Pb)	0.3 mg/l	Once every day	Yes
Zinc (Zn)	2 mg/l	Once every day	Yes
Manganese (Mn)	None set	Once every day	No

Action: Egan Waste to sample for missing parameters to complete emission to sewer inventory.
Sampling is in progress and the site will submit the results to NRW.

IC 5 BAT 4 Reduce the environmental risk associated with the storage of waste

c. Safe storage operation
Egan Waste has submitted a file showing the separation and storage of waste at the installation. The document details the form of the waste, the combustion risk, maximum storage period, method of separation, ignition source and water flow destination. The document meets the improvement condition.

IC 6 BAT 5. Set up and implement handling and transfer procedures to reduce the environmental risk associated with the handling and transfer of waste.

- *handling and transfer of waste are carried out by competent staff*
Egan Waste has submitted staff induction checklists, questionnaires environmental awareness document, and instruction procedures for the site (unloading tankers, spillage control and pre-treatment of oil waste) to ensure the safe handling and transfer of waste. These documents form part of Egan Waste's EMS.

- *handling and transfer of waste are duly documented,*
Egan Waste has submitted a document from their ISO 14001 manual and EMS detailing the work procedures for repacking /transfer of waste and how it is documented.

- *measures are taken to prevent, detect and mitigate spills;*
Egan Waste has submitted documents from their ISO 14001 EMS manual. The weekly site inspection checklist ensures that the sites waste and containment is correctly stored and in order.

- operation and design precautions are taken when mixing or blending wastes (e.g. vacuuming dusty/powdery wastes).
Egan Waste has submitted a document detailing the pre-treatment of oil waste where water and sediment is removed.

- handling and transfer procedures are risk-based considering the likelihood of accidents and incidents and their environmental impact.
The submissions for BAT 5 meet the improvement condition.

IC 7. BAT 7. Monitor emissions to water. To follow once emissions inventory is complete.

IC 8 BAT 19. Optimise water consumption, reduce wastewater generation and prevent/reduce emissions to soil and water

c) impermeable surface (information on how the site complies with CIRIA 736 or an equivalent engineering standard to which the surface complies together with sign off from construction by a Certified Quality Auditor).
When operation – needs a sign off by a CQA.

Following a site inspection on the 24/03/2023 it was observed that the impermeable surface requires repair. Numerous cracks, holes and damage can be seen throughout the site. The surface needs repair and sign off from construction by a Certified Quality Auditor.

Action: Repair the impermeable surface and get sign off from construction by a Certified Quality Auditor to show that it meets BAT.

h) Design and maintenance provisions to allow risk-based leak detection and repair. Minimise use of underground components.
The oil separation pit is emptied and inspected every 3 to 4 months.
Action site to send inspection procedure for the oil pit.

IC 9 BAT 20 Reduce emissions to water

Site is completing the water sampling. IC 9 & BAT 20 to be decided once the water sampling data has been reviewed by NRW.

IC 10 BAT 23 Use energy efficiently.

a. Energy efficiency plan – forms part of the EMS. Targets are set for E use. Part of 14001 to have an energy plan. Jobs are planned around location to minimise fuel use and trips.
b. Energy balance record – site is keeping an energy record at site for electricity + fuel

This meets the improvement condition.

IC 11 Soil and groundwater risk assessment.

Egan Waste has submitted a site condition report from when the site was surrendered from the previous occupiers of the site. The site condition report dated October 2001 states that no elevated concentrations of contaminants were detected within the soils at the site and no contaminants were detected in the groundwater. The survey took samples from 16 boreholes on the site.
This meets the improvement condition.

In summary, the following improvement conditions, 2, 3, 5, 6, 10, 11 have been completed.

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.