

## Compliance Assessment Report CAR\_NRW0041646

**Permit being assessed:** YP3135TE.

For: Newport Recycling Facility NRW/EPR/YP3135TE/V004, held by Celtic Recycling Ltd  
At: Celtic Recycling Ltd Clearwater Road, Clearwater Road, Queensway Meadow Industrial Estate, Newport, South Wales, NP19 4ST.

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

On 05/04/2023 between 09:55 and 11:15.

Parts of permit assessed: A1, C4, D1, F1, F3, F5

**NRW Lead Officer:** Ian James.

**Report sent to:** Philip Morris, Depot Manager on 06/04/2023.

### 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)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F5 - Amenity - Deposits on road	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

### Compliance Assessment Report – Celtic Recycling – YP3135TE

#### Compliance: No breaches were identified during the visit.

#### Introduction

On the 5<sup>th</sup> April 2023 your site was inspected by officer Ian JAMES.

The site holds the following permit;

#### **YP3135TE Version V005.**

The permit regulates a Section 5.3 A (1) (a) (ii) activity and A2 activities. The areas containing these activities are distinguished within the permit Site Plan.

The visit was hosted by Philip MORRIS (Depot Manager).

#### Discussion

PM gave an overview of the site activities including ongoing developments for expansion within the site boundaries.

Borehole monitoring was in progress as part of the 5 yearly requirement for PC 3.1.3, it was flagged that the contractor had only been able to locate the points east and west of the site.

As discussed if the contractor can compare results obtained in the two accessible boreholes (E & W) with those from 2018 and results are comparable we may determine that further sampling at this time is unwarranted.

**ACTION** – Please ensure comparison with 2018 data is made available for assessment when it is reported.

Water reporting – as agreed previously assessment/calculation for reporting is acceptable given delays in receiving data from DCWW. Once the actual data is received as long as there are no significant differences then it's agreed that notification / correction isn't required immediately. This can be done as part of the annual reporting as a note.

If there are significant differences, of >20% compared to initially calculated, please inform NRW.

Security – No security issues reported in the previous year.

Process – Customers are requesting the return of used oils requiring additional lab testing. PCBs are still tested in-house and this is being covered by an additionally trained member of staff due to maternity leave. This appears to be managed adequately although no detailed audit of training was carried out at the time of inspection.

Energy – Solar and LED lighting has been installed approx. 12 months ago. A recent audit highlighted this as a significant energy saving.

Water – No current plans for water reduction although the new build may well have conditions attached for drainage.

### Inspection

A large volume of work was being processed within the buildings, this appeared well controlled at the time of inspection. Processed materials were also awaiting shipping on lorries in the outside areas.

The lab area was visited and appeared to be well maintained. The recently trained member of staff seemed confident in following processes.

The shredding activity (A2) was not in operation at the time of inspection.

SF6 gas recovery is an on-going activity. There are significant stocks of this on-site, within Permitted levels. Some of this is contaminated material that can't be recovered and needs shipping for destruction at a permitted facility. PM stated that the receiving site was creating hold-ups with this movement.

Other material had been recovered and tested to be suitable for re-use but there appeared to be commercial pressures meaning these materials were also being stored longer than ideal.

Whilst there appeared no immediate concern for the volumes present, storage looked adequate and inventory well segregated and managed, it would be prudent to minimise stocks if possible.

For information - SF6 has an equivalent Green House Gas effect of 23500x CO2.

Overall external infrastructure appeared to be in good order and no litter was seen. It had recently rained and the surfaces were wet, highlighting a few small spots of 'oil' sheen. These would be managed by the drainage and interceptors but the Operator may wish to consider monitoring traffic to ensure no spills are transferred off-site. There was no evidence of this at the time of inspection.

Internally flooring was in a good state of repair.

Complaints – the Operator had not received any recent complaints.

### Round-up

IJ confirmed in closing that no compliance breaches had been observed during the visit.

With thanks.

If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Ian James on 03000 654203 or via email on [ian.james@naturalresourceswales.gov.uk](mailto:ian.james@naturalresourceswales.gov.uk)

**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](mailto: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](mailto: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.