

## Compliance Assessment Report CAR\_NRW0041667

**Permit being assessed:** AB3698ZE.

For: Mekatek Ltd, held by Mekatek Limited

At: Unit C, Maerdy Industrial estate (South), Rhymney, Caerphilly, NP22 5PH.

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

On 03/04/2023 between 10:50 and 11:50.

Parts of permit assessed: Various

**NRW Lead Officer:** Jak Rose, accompanied by Greg Gardner.

**Report sent to:** Jay Jones / Peter Ryall, TCM / Senior Compliance Officer on 14/04/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	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**

This compliance report details the site inspection conducted by Natural Resources Wales (NRW) Officers attended Mekatek Ltd, Unit C, Maerdy Industrial Estate (South), Rhymney, NP22 5NP - Permit number EPR-**AB3698ZE**.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

**Introduction**

Mekatek operate under a Tier 3 bespoke permit for household, commercial and industrial waste transfer station with treatment. Permitted waste types are Waste Electrical and Electronic Equipment (WEEE), batteries and accumulators and source segregated packaging materials including plastics and metals.

The maximum quantity of waste accepted and processed on site shall not exceed 30,999 tonnes per year.

Waste Regulation Officers Jak ROSE and Greg GARDNER arrived on 3 April 2023 at 10:50. The weather conditions were fine and dry which did continue for the duration of the inspection. Officers met with Mr Jay JONES, Technically Competent Manager (TCM) and Mr Peter RYALL, Senior Compliance Officer. Everyone was present during the entire inspection. The site was accommodating and cooperative throughout.

**ACTIONS FROM PREVIOUS SITE INSPECTION(S) - CAR\_NRW0040071 on 21 June 2022**

Action(s)	Completed (Yes/No)	Action Taken by Operator
Review the activities that you are undertaking as part of the waste exemptions you have registered at the site.	Ongoing	Mekatek are due to apply for a variation soon that will mean that the waste exemptions (T4 and T9) no longer be used. Please see sub section Environmental Management System below for more detail.

## Site Observations

Officers walked through via the offices after signing in. Officers were advised to wear PPE throughout which included ear defenders to be worn in operational areas.

Officers were escorted onto the facility's main operations floor. Immediately to the right-hand side there is an area designated for fluorescent tubes and a lamp crushing barrel where the bulbs are destroyed, and the hazardous dusts are stored in barrels ready for disposal.

Officers observed the unloading area in which vehicles approach the weigh bridge and then enter via the main roller/shutter door. It was noted that this entrance has been damaged due to some high sided trailers, the site has plans to increase the height of the entrance.

## Waste Sorting

Mr JONES and Mr RYALL showed us the waste sorting areas and then the workstations where wastes are manually sorted prior to mechanical processing and undertaken on individual workstations.

Officers looked at the various components of the wastes such as the cables, screens, motherboards etc which had been sorted into relevant categories and stored within stackable hoppers or stillages. The wastes will be stored until there is sufficient material to warrant processing through the rotor shredder.

## Maintenance Area

At the time of inspection there were some works taking place to change the layout of the maintenance section. The aim is to create an improved space for staff to carry out mechanical work on the trailers. (Photo 1)



**Photo 1 – area used for maintenance is currently marked as the exempt processing area on the site plan**

### **Shredder and Cable Granulation**

Officers were shown to the areas where the cable granulation process takes place. Officers observed the staff sorting and loading the cabling onto the conveyor. (Photo 2)





**Photo 2 – cable sorting and storage area**

### **Site Infrastructure**

There appeared to be no issues with the integrity and flooring within the building. Spills are managed utilising spill kits which were seen to be strategically located around the site.

The roads and concrete pads outside were discussed as being an area for improvement over the next few months. The Operator offered to provide a timeline of these works via email once they have been confirmed (Photo 3)



**Photo 3 – entrance on the left is where HGV's enter**

### **Site Security**

No issues were reported by the Operator regarding attempted break ins. The site appeared secure with perimeter fencing prohibiting access to the site.

### **Technically Competent Manager (TCM)**

An email with Jay JONES' continuing competence was received and saved the sites folder. The expiry date of the current scheme is 9<sup>th</sup> September 2024.



## Environmental Management System (EMS)

*“The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.”*

The current EMS that we have on file is dated August 2017. To reflect current operations please ensure that this document is kept up to date and reviewed on a regular basis. The Operator has informed Officers of the plans to seek a variation to the permit, the EMS review could also be done in conjunction with this.

Mr RYALL explained investment is being made into the exempt area of site over the next few months which will result in changes to on site processes. A review of the FPMP and EMS will take place prior to changes in the process and amendments made as required.

## Waste Returns

The maximum quantity of waste accepted and processed on site shall not exceed 30,999 tonnes per year.

A total of 11,365 tonnes were received at site in 2022.

Just as a reminder to the site of the quarterly waste return submission deadlines (table below).

### Waste Return Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

NRW Officers Jak ROSE Greg GARDNER left site at 11:50.

If you have any issues with this report, please contact Jak Rose on [jak.rose@naturalresourceswales.gov.uk](mailto:jak.rose@naturalresourceswales.gov.uk)

I look forward to working with the site in the future.

Thank you.

***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. Officers left site at 11:50.***

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.