

Compliance Assessment Report CAR_NRW0041889

Permit being assessed: BB3298HN.

For: Green Steel Works Ltd, held by Green Steel Works Ltd

At: Unit 6, Capital Valley Eco Park, Rhymney, Tredegar, Caerphilly, NP22 5PT.

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

On 03/05/2023 between 12:20 and 13:15.

Parts of permit assessed: 3.4. Fire

NRW Lead Officer: Jak Rose, accompanied by Susanna Fernandez .

Report sent to: Milo Thomas, Director/TCM on 26/05/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D2 - Incident Management - Accidents, emergency and incident planning	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 on 3 May 2023 at: Unit 6, Capital Valley Eco Park, Rhymney, Tredegar, Caerphilly, NP22 5PT. Permit EPR - BB3298HN.

Waste Regulation Officer Jak ROSE and Senior Enforcement Officer Susanna FERNANDEZ

arrived at 12.20 and met with Mr. Dwain OSBORNE, Operations Manager. The last routine site inspection was completed on 3 April 2023. The weather conditions were fine and dry during the time of inspection.

ACTIONS FROM PREVIOUS SITE INSPECTION - CAR_NRW0041669 on 3 April 2023

Action(s)	Completed (Yes/No/Ongoing)	Action Taken by Operator
Reduce stockpile heights outside of the building to 4m. Implement a fire break of 10m between combustible materials within Unit 5 also ensuring these stockpile heights remain under 4m. Stricter controls are needed to reduce the fire risk posed from the storage of these combustible wastes	Yes. (Due date: 02/05/2023)	Officers attended on 03/05/2023 to check the status of the stockpile and the fire breaks within Unit 5. (See below for further details)
Ensure waste types accepted to site are only those listed within Table 2.2 of your environmental permit. Ensure no further unpermitted waste types are accepted onto site. Remove 19 12 12 waste from site and send all waste transfer notes for the removal of the 19 12 12 wastes to your regulating officer. Ensure regular updates are held with your regulating officer as to the progress of the removal of these wastes.	Ongoing (Due date: 29/09/2023)	Operator has been sending regular updates to Officers showing 19 12 12 being removed from site and sent to: Street Fuel Limited, Berth 6, Chatham Dockyard, Berth 6, Basin 3, Chatham Dockyard, Gillingham, Kent, ME4 4SR -EPR/AB3007XN.
Ensure site activities are carried out in accordance with Table 2.3 Operating Techniques. All non-specified wastes must be stored and treated inside a building. Move all non-specified wastes, as identified in your environmental permit inside a building.	Ongoing (Due date: 30/06/2023)	Unpermitted wastes were still being stored outside at the time of the inspection.
Repair perimeter fencing behind bunded stockpile to prevent access to any unauthorised person(s).	Ongoing (Due date: 30/06/2023)	See Photo 4 – The fence has fallen that still needs to be repaired.
Continue with the plans to implement a sealed drainage	Ongoing via Reg 36 Notice (Due date:	Operator informed Officer that they have begun the process of consulting

system as per the operating techniques	29/09/2023)	with engineers regarding the new sealed system.
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Site Observations

Officers met Mr. OSBORNE the Operations Manager. Officers were stood in Unit 5 and it was observed that there are now sufficient fire breaks in place.

Please continue to rotate these internal stockpiles as part of your daily checks for hotspots particularly heading into the warmer months, as referenced in your FPMP. It is stated within your FPMP that combustible fines/dusts and small particle size wastes have a maximum storage time on site of one month. (See photo below)



Photo 1 – access through the stockpile, see waste on left of photo is now 10m away from combustible material

Officers walked out of Unit 5 and observed that the stockpiles near the shutter doors of Unit 6 were still more than 4m in height. Officer ROSE asked Mr. OSBORNE if he was able to reduce these down while Officers stayed on site, below are before and after photos.



Photo 2 (above) showing the stockpile when Officers arrived on site.



Photo 3 (above) stockpiles after staff used machinery to reduce height to less than 4m.

Thanks to Mr. OSBORNE and other staff involved in reducing the stockpile. Their responsiveness

means that the Actions for reducing the stockpile heights have been completed. Please ensure these stockpiles remain under 4m. Mr. OSBORNE remarked the use of a sign painted on Unit 6 will assist the operator and serve as an active reminder to keep stockpiles of waste below 4m.

Thank you for your time and I look forward to working with the site in the future.

Officers left site at 13:15.

If you have any issues with this report, please contact Waste Regulation Officer Jak Rose at jak.rose@cyfoethnaturiolcymru.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 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.