

## Compliance Assessment Report CAR\_NRW0041262

<b>Permit number</b>	CB3393ZB	<b>Operator name</b>	GLJ Recycling Limited
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<b>Site name</b>	GLJ Recycling Limited
<b>Site address</b>	Lower Chapel Bridge Yard, Cwmcarn, Cross Keys, Newport, NP11 7NL
<b>Assessment type</b>	Assessment against monitoring and reporting requirements

<b>Date of assessment</b>	17 February 2023	<b>Time in</b>	N/A	<b>Time out</b>	N/A
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<b>Parts of permit assessed</b>	See Part 4
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<b>NRW Lead officer</b>	Guy Baskerville	<b>Accompanied by</b>	N/A
<b>Report sent to – Name and position</b>	Gareth Jones Director	<b>Date</b>	20 February 2023

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales	C4 No environmental impact	4.2.2
G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment	C4 No environmental impact	3.5.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
2	0

### 2. What action is required?

Criteria	Action needed	Complete by
G4	Operator to submit future performance reports inside reporting window.	N/A
G1	Operator to undertake the monitoring specified in the table S3.1 in schedule 3 of the environmental permit.	N/A

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 prosecutions and/or suspension or revocation of your permit.

#### 4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment against GLJ Recycling Limited's (hereafter 'the operator') annual [2022] monitoring and reporting requirements. NRW's assessment of the operator's monitoring returns data is outside the scope of this CAR and any non-compliance arising from an exceedance of a permitted emission limit will be recorded in a separate CAR.

Condition 4.2.3 of the environmental permit states:

*Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:*

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Emissions to air Parameters as required by condition 3.5.1	A1	Annually	1 January

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	23/12/2021

Monitoring report(s) for emissions to air were submitted via email on 15 November 2022

The monitoring report(s) submission was made inside the reporting window which represents compliance with the environmental permit.

The monitoring report(s) submitted include reporting of monitoring carried out in respect of the parameters and emission points specified in schedule 4(a) table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) submitted are for the reporting periods specified in schedule 4 table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) have been submitted using the forms specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

The monitoring report(s) submitted include results and assessments as required by the forms specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

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Condition 4.2.2 of the environmental permit states:

... A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

Table S4.2 of Schedule 4 to the environmental permit is reproduced below.

<b>Table S4.2 Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
Hazardous Waste Treatment	Tonnes
Non-Hazardous Waste Treatment	Tonnes

Table S4.3 of Schedule 4 to the environmental permit is reproduced below.

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of Assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MW/h

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	23/12/2021
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	23/12/2021

A partial performance report was submitted via email on 15 November 2022 presenting performance data for the period August 2021 – September 2022. Annual performance reports are to present data in relation to the previous calendar year.

The performance report(s) submission was made inside the reporting window which represents compliance with the environmental permit.

The performance report(s) submitted do not include a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data which represents non-compliance with the environmental permit.

The performance report(s) submitted do not include the annual production/treatment data set out in schedule 4 table S4.2 which represents non-compliance with the environmental permit.

The performance report(s) submitted do not include the performance parameters set out in schedule 4 table S4.3 which represents non-compliance with the environmental permit.

The performance report(s) have been submitted using the forms specified in schedule 4 table S4.4 which represents compliance with the environmental permit.

As a result of this non-compliance a CCS Score [C4] has been recorded against compliance sub-criteria G4: Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales. However, with consideration of the operator’s clear intent to make the submission and following prompt provision of the missing data upon request, this score is suspended.

Action 1: Operator to submit future performance reports inside reporting window.

Condition 3.5.1 of the environmental permit states:

The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:  
 (a) point source emissions specified in tables S3.1.

Table S3.1 of Schedule 3 to the environmental permit is partially reproduced below.

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1	Abatement plant exhaust (including bag-plant) serving shredder	Dust	5 mg/Nm <sup>3</sup>	Hourly average	6 monthly	BS EN 13284-1
		Brominated flame retardents	None set	None set	1 per annum	None set
		Dioxin-like PCBs	None set	None set	1 per annum	EN 1948-1, -2 and -4
		Metalloids As, Cd, Co, Cr, Cu, Mn, Pb, Sb, Se, Ti and V	None set	None set	1 per annum	EN 14385
		PCDD/F	None set	None set	1 per annum	EN 1948-1, -2 and -3 or CEN/TS 1948-5
		TVOC	None set	None set	6 monthly	EN 12619

The monitoring report(s) submitted include monitoring data for dust and TVOC undertaken during the 6-monthly period; July – December 2022 only. Monitoring data for dust and TVOC during the 6 monthly period January – June 2022 was not submitted.

Failure to undertake the monitoring described in Table S3.2 of Schedule 3 represents non-compliance with the environmental permit.

However, during a compliance inspection undertaken on 07 July 2022, the operator stated that the contracted environmental monitoring provider had been unable to undertake the dust and TVOC monitoring for the 6 monthly period January – June 2022 due to lack of suitable access facilities at the emissions stack. The operator has since worked alongside the environmental monitoring provider to install the necessary infrastructure.

As a result of this non-compliance, a CCS Score [C4] has been recorded against compliance sub-criteria G1: Monitoring and records, maintenance and reporting – Monitoring of emissions and environment. However, with consideration of the operator advising NRW of the failure to undertake the monitoring due to lack of suitable access facilities at the emissions stack prior to the closure of the reporting window, this score is suspended.

*Action 2: Operator to undertake the monitoring specified in the table S3.1 in schedule 3 of the environmental permit.*

*Recommendation 1: Operator to review monitoring and reporting requirements detailed in the environmental permit and seek expert guidance where any confusion remains.*

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[END]

## 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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

### 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.