

Compliance Assessment Report CAR_NRW0042274

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 03/08/2023 between 10:00 and 11:50.

Parts of permit assessed: 1, 2, 3 & 4

NRW Lead Officer: Jak Rose, accompanied by Luke Burton.

Report sent to: Daniel Lewis, Jay Jones, Peter Ryall, Compliance Director, Site Manager, Senior Compliance Officer on 14/08/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E3 - Emissions - Surface water	C3 Minor	3.1.3
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
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)	
F2 - Amenity - Noise	Assessed (A)	
F1 - Amenity - Odour	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
1	4

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
E3	Adhere to spill response procedures outlined in the Environmental Procedure Infrastructure Management and Monitoring Programme, Mekatek should ensure staff are well-trained in spill response protocols.	18/08/2023
B1	A review of the integrity of the surface across the entire site is recommended. The operator should assess the condition of all paved areas, identifying any damage, deterioration, or potential hazards. This assessment can inform a maintenance and repair plan.	29/09/2023

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 announced routine site inspection conducted by Natural Resources Wales (NRW) Officers attended Mekatek Ltd, Rhymney- Permit number EPR-**AB3698ZE**.

NRW Officers Jak Rose, Waste Regulation Officer and Luke Burton, Lead Specialist in the Southeast Industry Team arrived at 10am. Also in attendance was Sophie Rainey and Matthew Wiese from Sol Environment. Daniel Lewis, Technical and Compliance Director for Mekatek, Jay Jones, Site Manager and Peter Ryall, Senior Compliance Officer. The weather conditions were fine and dry at the time of the inspection.

The inspection began with a meeting to discuss the company's intention to apply for a permit variation and what would be expected in terms of any changes to the site's activities. Sol Environment will be assisting Mekatek with the application and it is understood that the site wishes to increase the hazardous storage and treatment capacity which may result in this becoming an installation activity and regulation moving to the Southeast Industry Regulation Team. Luke Burton was there to advise in relation to this and will assist with regards to any pre-application advice going forward.

Permit Breaches

E3 - Surface water – Cat 3; Permit Condition 3.1.3

You have been given this category 3 breach under the above condition because during our inspection it was observed that an unknown chemical spillage outside had no containment, this spillage was also in very close proximity to one of the surface water drains in the yard.

(Photo 1)



Photo 1 – unknown liquid migrating towards surface water drains within yard area outside main building.

Permit condition 3.1.3 states *All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.*

During the inspection Officers highlighted the spillage and Jay Jones spoke to an operative who arrived immediately with appropriate spillage granules. The origin of this spillage is unknown, but it was suggested that it may have been caused by the recent movement of some equipment being stored outside.

Ensure that equipment is stored in a manner that minimizes the risk of spills or leaks. Consider weather protection and secure storage to prevent unexpected spill events.

In cases where it is not feasible to provide secondary containment, the operator is expected to implement other appropriate measures to prevent or minimise leakage and spillage from the primary container.

Action required: Adhere to spill response procedures outlined in the Environmental

Procedure Infrastructure Management and Monitoring Programme, Mekatek should ensure staff are well-trained in spill response protocols.

Due date: 18th August 2023

B1 - Engineering for prevention and control of emissions - Action only

Areas of the main building have been prepared for the incoming shredding equipment. As a result, there are portions of the flooring that have been left exposed and Officers noticed some damage to these areas. (See below)



Photo 2 – area in main building in preparation for the arrival of the shredder.



Photo 3 – visible cracking in the area where the reception bays were located.

As per the sites Environmental Procedure Infrastructure Management and Monitoring Programme it states that *Inspections will pay particular attention to signs of damage, deterioration and leakage. If any damage is noted, it will be recorded in the site dairy and will be repaired as soon as possible.*

This proactive approach to monitoring and maintenance helps ensure that potential problems are identified early and addressed promptly, contributing to the overall environmental compliance and integrity of the site.

The photos suggests that there might be issues related to the overall condition, stability, or quality of the surfaces on the site. A review of the site's surface integrity could involve assessing factors like wear and tear, structural stability, potential hazards, and overall maintenance needs.

It appears that there has been a recurring issue related to the roads and concrete pads areas outside the main building. The operator has acknowledged that these areas need improvement, and this concern has been highlighted in previous inspections as well (CAR_NRW0041667, CAR_NRW0040071). However, despite these mentions, the necessary improvement works have not been carried out by the time of the most recent inspection.

The Operator offered to provide a timeline of these works via email once they have been confirmed.

Action required: A review of the integrity of the surface across the entire site is

recommended. The operator should assess the condition of all paved areas, identifying any damage, deterioration, or potential hazards. This assessment can inform a maintenance and repair plan.

Due date: 29th September 2023



Photo 4 – deterioration of concrete surface within the cable storage area.

Actions from previous inspection

There are no outstanding actions from the previous inspection carried out on 3 April 2023.

Waste Returns

All returns are up to date.

Site Security

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

Technically Competent Manager (TCM)

Jay Jones' continuing competence was received and saved in the sites folder. The expiry

date of the current scheme is 9th September 2024.

Permit Variation Application

Since Mekatek intends to apply for a permit variation, please work closely with Sol Environment to ensure that all necessary information is gathered, and the application is submitted accurately. Please maintain open lines of communication with NRW throughout the application process. If you have questions or need clarification on any aspects of the application, reach out to the appropriate NRW contacts.

NRW Officers left site at 11:50.

If you have any issues with this report, please contact Jak Rose on 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 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.