

Compliance Assessment Report CAR_NRW0042332

Permit being assessed: PP3993VS.

For: Atlantic Recycling Limited, **held by:** Atlantic Recycling Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/01/2023 between 10:00 and 13:00.

Parts of permit assessed: Waste Acceptance .

NRW Lead Officer: Lewis Evans, accompanied by Antony Leakey.

Report sent to: Phil Ridley, Business Manager, on 23/08/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Operations - Operating techniques	Action only (X)	
IR4A - Information - Records	Action only (X)	
IR2A - Operations - Permitted activities	Action only (X)	
IR2A - Operations - Permitted activities	Action only (X)	
IR2D - Operations - Technical requirements	Action only (X)	
IR4A - Information - Records	Action only (X)	

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

Total 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?

Criteria	Action needed	Complete by
IR2C	Please ensure that all pickup's that are made have been logged on your system and the correct details of where the waste came from is noted.	Already completed
IR4A	Please ensure that training records are kept and updated as and when they are completed, and that WAMITAB certificates	Already

Criteria	Action needed	Complete by
	are renewed prior to the expiry date.	completed
IR2A	ACTION 1: Please submit the WM3 report of the silt material that has been removed from site on May 2021 by the 20th of September 2023.	20/09/2023
IR2A	ACTION 2: Please submit the full report that would have been included with the analysis certificate for the material that has been sent to Pwllfawarkin Landfill site. – This was received on the 15th May 2023.	Already completed
IR2D	ACTION 3: Please submit the sampling plan of the trommel fines that have been exported from site. The sampling plan should be in line with Appendix D of WM3 by the 20th September 2023.	20/09/2023
IR4A	ACTION 4: Please submit to NRW, complied historic fines sampling analysis data going back at least 5 years. Please note, we are not requesting individual analysis reports at this stage, but just a summary of the data by the 20th September 2023.	20/09/2023

Compliance 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.

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

Atlantic Recycling Limited

Permit Reference: EPR-PP3993VS

Natural Resources Wales (NRW) officers Lewis EVANS and Tony LEAKEY visited Atlantic Recycling Limited (ARL) on the 25th of January 2023 to complete an audit of ARL's waste sampling procedures, waste acceptance procedures, training records and complete a walkover of the site. Present from ARL was Phil Ridley, Gavin Powell, John Edwards, David Neal and Ahlim Hashm.

An agenda was sent to ARL prior to the meeting to request documents for NRW to review

and to provide ARL with time to gather information for the audit on the day.

Prior to the site visit and as requested by NRW in the agenda, ARL submitted the following documents to NRW:

- IMS16 - Atlantic Recycling Operations
- IMS16-01 - Dealing with Non-Conforming Loads
- IMS16-02 - Site Management Manual
- IMS16-02-01 – ARL General Waste Operations
- IMS16-02-04 – Plasterboard Waste Operations
- IMS16-02-05 – RDF Operations
- IMS16-02-06 – Asbestos Waste Operations
- IMS16-02-07 – Residual Waste Operations
- IMS16-02-08 – WEEE Operations

Site Walkover

The audit started with a walkover of the site. It was decided to follow the material through the site, from the initial arrival of the skips passing the weighbridge, tipping the waste, sorting and then being put on the lines for recyclable material to be picked.

A lorry carrying a skip with waste material was chosen at the weighbridge. Unfortunately, the skip that was selected had brought material from the site managers home and the lorry driver was unable to show the pickup details on his iPad. This event is not classified as a non-compliance, however it is against the procedures that ARL have set out for incoming wastes.

ACTION: Please ensure that all pickup's that are made have been logged on your system and the correct details of where the waste came from is noted.

Phil RIDLEY explained that lorry drivers get notifications on where they will be dropping off or picking up a skip on the day and therefore the lorry can be theoretically traced. He also went on to explain that the first point of waste inspection is when the lorry driver picks up the skip. If any waste is noticed that should not be in the skip, the driver uses the iPad to take pictures of the waste and will not remove the skip from that property. The customer will get a phone call for them to then remove the waste from the skip or incur an additional payment

in order to accept the waste. Officers EVANS and LEAKEY entered the weighbridge operating room to ask the operator of the process they go through when a lorry arrives to site. Within the operating room, several screens showed multiple cameras pointing towards the incoming lorries, at the load the lorry was carrying. This was used to help the operator view what was inside the lorry. The weighbridge operator explained that when a lorry approaches, he identifies the lorry (using the vehicle registration) this will then show him the location the waste came from and the type of waste that was expected. Using the cameras, he can identify if the waste type matches that of the description of what the customer stated when placing an order for the skip. The lorry is then weighed, and a calculation is then done to give the weight of the waste incoming on site, the lorry is then allowed to enter the site and will queue up prior to unloading on site.

Once passed the weighbridge the lorry travels down a one-way track to await instructions to drop off the material in a designated area for the picker. In this area, the picker uses a track machine fitted with a pincher to separate bulky material from smaller wastes for it to go through the Phase 1 line for material to be picked off. Inside Phase 1, there are workers who pick out recyclable material such as wood, metal, rubble and plastic and drop them in the relevant sections below. Once the material has passed through Phase 1 the material is then passed through Phase 2 which gets processed further and any missed material is picked here. A magnet is also used to attract ferrous metals out of the lines. Along Phase 2 some SRF material is separated and is mixed in with the main SRF material to be sent off site.

The material on the transfer station has reduced in volume since the previous visit to site. However, the volumes of material to be treated on the transfer station is still high as of the visit in April 2023. Further comments on the material at the transfer station will be made in the CAR following the visit on the 11th of August 2023. Officers were then shown the SRF area which is next to the two picking lines. A large pile of untreated SRF is located outside before this is to be shredded and made to the specification of the customers of the SRF. We will review the compliance of the storage of the SRF at the next site inspection.

After completing the walk over, ARL lead the NRW officers to the office to cover the remaining points of the agenda.

Permit Condition 1.1.1 – Review training records

ARL showed the training spreadsheet with names of employees along with the associated training they are expected to complete. Examples of the training staff undertake are: Environmental Awareness, Waste Acceptance Procedures, Asbestos Awareness, Health & Safety. General plant operations undertake training approximately every three years. ARL have a system in place (Si-tation) to highlight when training is due. A number of staff hold WAMITAB certificates. The 'Bridgewater Education for Duty of Care' document was submitted following the visit on the training completed by ARL staff. The document contains question to describe the persons knowledge on the documents that should be shown when material comes on and off site. The training document shows, if understood, that the description of material will meet the actual properties of the material.

Please ensure that training records are kept and updated as and when they are completed, and that WAMITAB certificates are renewed prior to the expiry date.

Permit Condition 2.3.3 – Waste Acceptance

During the site walkover, a number of observations were made which indicated that waste that enters the site do follow the procedures set out by ARL. Apart from the lorry that was observed entering site without the correct paperwork. It does appear that the pre-acceptance of wates is followed by the lorry drivers when picking up a skip, and as per the guidance ARL hold, drivers will not pick up the load and bring back to site. To ensure the competency of drivers remains at its highest, please ensure all staff conduct trainings and refreshers as and when they are required. There are a number of check points to allow ARL to identify any wastes that do not conform to what is accepted, such as the lorry driver, weighbridge operator and in the skip drop off location. Phil RIDLEY explained the procedure ARL complete when they have identified a non-conforming load that has entered site. This process follows that which is within IMS16-01 – Dealing with Non-Conforming Loads if the wastes have been tipped. If the waste has not been tipped yet, the procedure as set in IMS12 will be followed. This does appear to be compliant, but further work will be required to fully scrutinise the documents. An example of this is the non-conforming load examples only contains the plasterboard threshold but contains no other examples.

Permit Condition 2.3.4 – Waste Sampling Procedures and Permit Condition 2.3.5 –

wastes to Landfill

While in the office, Gavin POWELL got up on the screen a couple of waste transfer notes and following the visit had sent the waste tickets over. The waste transfer note contained the following information: Ticket Number, Direction of travel (on or off site), Time & Date, Vehicle Registration and type, Haulier Name, Address and contact details on where the waste has come from or going to, the waste code of the waste with a description of the waste and the weight of waste.

During the site walk round, questions were brought up regarding the silt that accumulates from the transfer station as well as the remainder of the site and what ARL does with this material. Following the visit, Gavin POWELL submitted an analytical test report of the silt material from May 2021. Along with this, he stated that the material is removed from the drain and stored in a quarantine area, the material is then composite sampled, tested and assessed against the latest technical guidance for waste classification. The silt material is then moved to Neal Soil Suppliers Limited for further processing as Non-Hazardous material.

ACTION: Please submit the WM3 report of the silt material that has been removed from site on May 2021 by the 20th of September 2023.

ARL have also sent over an analysis certificate for waste material that has been sent over to landfill. This was requested in the site office on the day of the visit. The analysis was completed by Socotec for material going to the Pwllfawatkin Landfill Site in Pontardawe, Swansea. The certificate was issued on the 24th of November 2022.

ACTION: Please submit the full report that would have been included with the analysis certificate for the material that has been sent to Pwllfawatkin Landfill site. – This was received on the 15th May 2023. The following text are NRW's comments on the report.

On the 15th of May, Gavin POWELL submitted to NRW the Classification Report, which is the Haz Waste Online Assessment that they have completed and the Certificate of analysis of the trommel fines that were sent to Pwllfawatkin Landfill Site. Upon review of these documents, NRW have the following comments on the documents.

One sample was provided in the report to support the classification of trommel fines as 19 12 12 (MN) Non Haz. As trommel fines can be heterogeneous and therefore can vary greatly depending on the waste input from site. In order for ARL to demonstrate that their fines are consistently mirror non-haz, a sampling plan will need to be submitted to NRW which would include: A full characterisation of the fines taken over a period of time; The methodology used for taking the samples and the lab analysis results; An assessment of the results and the proposed on-going frequency of testing. With this, ARL will be able to demonstrate their exported fines are consistently 19 12 12 (MN).

Action: Please submit the sampling plan of the trommel fines that have been exported from site. The sampling plan should be in line with Appendix D of WM3 by the 20th of September 2023.

Action: Please submit to NRW, complied historic fines sampling analysis data going back at least 5 years. Please note, we are not requesting individual analysis reports at this stage, but just a summary of the data by the 20th of September 2023.

END

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.