

Compliance Assessment Report CAR_NRW0042523

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: 11/08/2023 between 09:30 and 12:30.

Parts of permit assessed: Site Inspection.

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

Report sent to: Phil Ridley, Business & Development Director, on 24/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Operations - Permitted activities	C3 Minor	2.1.1
IR4A - Information - Records	Action only (X)	
IR2C - Operations - Operating techniques	Action only (X)	

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

Total 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
IR2A	ACTION 1: Please can you explain how you are going to comply with the requirements in your permit to cover or house the unprocessed material?	09/11/2023
IR4A	Action 3: As per CAR_NRW0042332 – Action 5 please submit to NRW to include the material from Field 2. A new revised due date on Action 5 will be in place. Please submit to NRW by the 9th of November 2023.	09/11/2023
IR2C	ACTION 2: Confirm that waste stockpile temperature probes	27/10/2023

Criteria	Action needed	Complete by
	have been connected to the monitoring system and provide photo and data evidence to support this by the 27th of October.	

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 11th of August 2023 to conduct a general site walk over inspection of the activities. Officers arrived on site at 09:20 to meet Phil Ridley and John Edwards at the security gatehouse.

General discussions of the site took place while officers were putting on the appropriate PPE. These included upgrades to Newton Road where the road will be widened to allow a flow of traffic both ways rather than the current single-track road with passing places. The widening of the road would be in field 4 as the opposite side of the track there is a ditch. Another upgrade will be to the weighbridge where ARL are planning on installing a further two weighbridges to allow a two in and two out which will reduce the waiting times for arriving and departing times. During the walkover there were also discussions on ALR to increase the tonnages to be accepted on site, however, this will be further in the future as the company have other improvements they wish to carry out.

Site Walkover

Transfer station

At the Transfer Station area there were three stockpiles of waste seen. The images below were taken on the day of the visit.



Picture 1 - Trommel Fines on the Transfer Station

The image above shows the trommel fines that have come off the trommels on Phase 1 and Phase 2. The trommel fines stockpile is quite large, as this material is waiting to be sent off site. Questions were asked regarding the testing regime of the fines. Neither Phil nor John was able to answer this during the visit but an action has been placed in CAR_NRW0042332, which will be able to address this point. No dimensional measurements were taken of the stockpile on the visit.

To the right of the trommel fines is a stockpile which has been processed through the phases and is due to be sent to landfill.



Picture 2 - Processed RDF material on the Transfer Station

Both Phase 1 and Phase 2 were online on the day with material being picked off and being dropped into the appropriate areas. Some residual SRF fractions material which were coming off the two phases were collected which was being mixed in with the incoming SRF material, as seen in the image below.



Picture 3 - SRF fractions being deposited into designated bay prior to mixing with imported SRF



Picture 4 - Material to be processed on the far-right area of the Transfer Station

In the picture above, this is material that is waiting to be processed through MRF. Material will then be sorted into the associated area and recycled where possible.

Overall, the Transfer Station area was maintained, and the stockpile levels were far less than on the previous visit on the 4th of April 2023.

SRF Area

Next on the walkover was the SRF yard. Questions were asked regarding the locations of the exported SRF material. Phil answered by stating that there were some issues with one of the destinations of the SRF which has resulted in the termination of that contract, but there were no issues with the other contracts in place. Phil mentioned that the site was receiving SRF material daily which explains why the SRF yard was quite full of unprocessed material. In which it was stated that there was a few weeks' worth of material accumulating.



Picture 5 – Incoming SRF Material with SRF fractions from site to the right (brown in colour)

The picture above shows a stockpile of unprocessed SRF material that is waiting to be processed inside the building behind the camera.

Permit condition 2.1.1 states

“The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).” Table S1.1 then states “Storage of all non-hazardous waste prior to treatment shall take place inside a building on an impermeable surface with sealed drainage.”

Several documents in Table S1.2 Operating Techniques, such as the email Received on the 15th of October 2019 stating SRF will be stored inside the building, the Operating techniques update v4 (dated Jan 2019) state that the SRF / RDF material will be stored inside the building prior to treatment. When questions on the matter were asked on the visit, it appears that ARL believe that the unprocessed material can be stored outside, uncovered, with the processed material stored inside the building.

We consider outside storage of the SRF prior to processing is non-compliant with permit condition 2.1.1 and may result in reduced SRF quality due to exposure to the weather, lowering the calorific value of the final product and increasing the potential for contamination of surface water run-off. This is a **minor category 3 non-compliance** at this stage due to the continued export of the material for use in cement kilns and current surface water

management practices.

ACTION: Please can you explain how you are going to comply with the requirements in your permit to cover or house the unprocessed material? Given that the impact on the SRF quality may decrease with it being exposed to the weather which lowers the calorific value of the final product and the increased potential for contamination of surface water run-off.

Field 1

The following pictures are from Field 1.



Picture 6 - Image of compost material



Picture 7 - Image of wood stockpile



Picture 9 - Image of Plasterboard material



Picture 8 - Image of unprocessed RDF material



Picture 10 - Image of the stockpiles on Field 1

Picture 8 and 10 show material that is waiting to be processed through the MRF. The material is stated to have been on site between 6 weeks to two months. This material will be processed and have been removed from site by late December. The material at the rear of Field 1 is the oldest material which is to be processed first and working their way backwards towards the front of Field 1 which is the newest material on site. As picture 10 shows there is a firebreak between the stockpiles of material. It was stated on the visit that the gap was 12m, however this was not measured on the day of the visit, but it appears to be sufficient distance. The width of the stockpiles was stated to be around 20m, again no measurements were taken but again this would appear to be approximately around that figure. Sources for incoming material have slowed down which could indicate the processing of the material that was on Field 1. It was stated that Field 1 has around 23,000 tonnes of material in total and there aren't plans to increase the amount of material on Field 1.

Temperature probes have been installed in the stockpiles to monitor the temperature;

however, these have not been connected to the monitoring system located in the security house. Version 8 of the Fire Prevention and Mitigation Plan dated April 2023 was submitted to NRW on the 5th of June 2023, this has yet to be approved by NRW. It states within that material which has been on site for greater than three months will have permanent means of temperature monitoring on them. As the material on Field 1 had been on site for between 6-8 weeks at the time of the visit, which is below 3-month time window temperature monitoring was not required at that time. However, at the time of the issuing of the CAR, the material should have temperature monitoring implemented.

The height of the stockpiles on Field 1 (although were not measured at the visit) appear to not meet the heights set out in NRW's FPMP Guidance and this will be addressed once the latest FPMP submitted by ARL (version 8 Dated April 2023) has been reviewed against the guidance.

ACTION: Confirm that waste stockpile temperature probes have been connected to the monitoring system and provide photo and data evidence to support this by the 27th of October.

Field 2



Picture 11 - Image of earth material on Field 2



Picture 12 - Stone crusher in operation on Field 2

The above pictures were taken on Field 2 during the walkover of the site. Picture 11 is material that has come off the MRF on site which was described as “dirty hardcore”. It was stated that the material will be processed to remove the recyclable materials within. The remaining material will be going off site to landfill following this. The material that will be sent to landfill will be tested every 1000 tonnes.

Action: As per CAR_NRW0042332 – Action 5 please submit to NRW to include the material from Field 2. A new revised due date on Action 5 will be in place. Please submit to NRW by the 9th of November 2023.

Picture 12 shows the soil passing through the soil processor on site. On the day two large excavators were working in the area feeding the soil and rubble into the machine. The soil material on the left-hand side is to be processed and the right-hand side the soil having been processed. The large stone that can be seen in front of the machine are due to be sent over to Neals to be crushed to different sizes and will be sent out as product.

Field 3

There was no activity taking place on Field 3 on the day. This area is made up of mostly soil covered in vegetation. Phil stated that their plan was to process the material on the field and remove this from site.

Field 4

Picture 13 - Inert material with glass stockpile on Field 4



Picture 14 - Field 4 being used as parking for lorry trailers

Field 4 currently holds a large stockpile of glass and rubble mixed material as can be seen in picture 13 above. This is being processed and being sent to Europe. The other areas of field 4 is being used for articulated lorry trailer parking. Now the fleet size has increased to approximately 42 lorries, the plan at ARL is to clear the entire field and put hardcore as a base for the lorry parking.

Summary

Overall, the volume of material on site appears to have reduced since the previous visit. The material on transfer station has reduced significantly and appears to have a more manageable volume of material. The SRF yard, however, appears to be less managed with a large stockpile and SRF material scattered across the yard. This could be down to the material being out in the open and not covered. Field 1 has now been cleared of all the historic waste, and the current waste there will be removed by the end of the year. There will also be several upgrades to the site with the building at the rear of the site, entrance road and the weighbridge.

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.