

Compliance Assessment Report CAR_NRW0042682

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 17/10/2023 between 10:50 and 12:00.

Parts of permit assessed: All

NRW Lead Officer: Jak Rose, accompanied by Jodie Baskerville.

Report sent to: Milo Thomas, Director/TCM on 30/10/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
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)	
D1 - Incident Management - Site security	Assessed (A)	
E3 - Emissions - Surface water	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?

Criteria	Action needed	Complete by
C4	Ensure that the Operating techniques in Condition 2.3 are always followed. If waste is stored outside, then they must be within a secure container unless they are specified waste.	30/11/2023

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.

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 on 17/10/2023 by Natural Resources Wales (NRW) Officers at: Unit 6, Capital Valley Eco Park, Rhymney, Tredegar, Caerphilly, NP22 5PT. Permit EPR - BB3298HN.

Waste Regulation Officer Jak ROSE and Senior Waste Regulation Officer Jodie BASKERVILLE arrived at 10:50 and met with Mr. Milo THOMAS, Director/TCM and Mr. Dwain OSBORNE, Operations Manager. The last routine site inspection was completed on 05/07/2023. The weather conditions were fine and dry during the time of inspection.

ACTIONS FROM PREVIOUS SITE INSPECTION – ref: CAR_NRW0042131 on 05/07/2023

Action(s)	Completed (Yes/No/Ongoing)	Action Taken by Operator
Minimise stack sizes, small stacks with appropriate separation are safer than one larger one. Demonstrate good stock rotation for all stored materials and show how this is monitored and implemented daily. Surround these stockpiles with concrete blocks and create bays as stipulated in the FPMP.	Yes	During the inspection mattresses were shown to be in excessive amounts and potentially breaching the FPMP requirements. This was due to ongoing mechanical issues on site (discussed further in report). On 20/10/2023 the operator sent photos showing the stockpile had been reduced with concrete blocks showing the fire breaks.
Remove non specified waste from outside. Operator must comply with Table 2.3 of the Operating techniques. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.	Yes	During the inspection most wastes were removed from outside. There were some cables and incoming wastes that were in excess amounts awaiting processing outside the entrance of Unit 6 (discussed further in the report). On 20/10/2023 the operator sent photos showing the cables removed and incoming wastes were halved. The amount of the

		wastes stored outside regularly will be discussed further in the report.	
Installation of a containment system for a tank, IBC, or mobile bowser. This must be sufficient capacity to contain at least 110% of the maximum contents of the oil container. Where more than one container is stored, the bund must be capable of storing at least 110% of the largest tank (or of one tank if they are the same size), or at least 25% of the total storage capacity, whichever is the greater.	Yes	The operator has purchased spill pallet bunds and placed IBCs and fuel on these within Unit 6.	
Notify the regulating officer without delay of any mechanical breakdowns on site which has the potential to breach the condition of the permit or cause a significant adverse environmental effect.	Yes	The operator has continued to notify the regulating officer when there have been mechanical breakdowns.	
Continue with the proposed drainage works on site.	Yes	These are nearing completion by GPT Environmental who had been on site prior to the inspection.	
Continue with the removal of 19 12 12.	Yes	The historic storage of this waste stream has been removed and the operator has sent regular updates with transfer notes to the regulating	

		officer.
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Regulation 36 Schedules

(Issued 14/12/2022)

SCHEDULE 1 STEPS TO BE TAKEN		
Condition number	Steps to be taken	By date
2.3	Conduct engineering works to improve the site infrastructure. Create an appropriate sealed drainage system that captures emissions from waste activities within the permit boundary. This is in order to comply with the permit requirements specified in Table 2.3 Operating Techniques (EPR- BB3298HN).	29 th September 2023

(Issued 24/07/2023)

SCHEDULE 1 STEPS TO BE TAKEN		
Condition number	Steps to be taken	By date
2.2.1	Remove all wastes other than those listed in table 2.2 of the SR2008 No3 environmental permit. This is in order to comply with permit Condition 2.2.1 Waste acceptance (EPR- BB3298HN).	29 th September 2023
2.3.1	Remove all wastes unless stored or treated outside Units 5 and 6 as specified waste. Specified waste means the following waste codes in Table 2.2: 01 01 01, 01 01 02, 01 04 08, 01 04 09, 01 04 13, 02 04 01, 10 11 12, 10 12 08, 10 13 14, 15 01 07, 17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 02 02, 17 03 02, 17 05 04, 17 05 08, 19 12 05, 19 12 09 and 20 02 02. This is in order to comply with the permit requirements specified in Table 2.3 Operating Techniques (EPR- BB3298HN).	29 th September 2023

Site Observations

Unit 5

This building is where the mattresses are stored and houses the wash plant and the shredded wastes. Officers were first shown the areas around the perimeter of the building where the channel strip drains channels have been installed by GPT Environmental. There have been extensive structural works to get these installed as per the requirements of the Regulation 36 Notices (see above).

These will all drain to sealed sumps to allow the correct management of spilled materials. Regular collection of water from the sump would be via pumps into suitable containers for offsite disposal. The operator is unsure as to how often this would need to take place, once a pattern of maintenance is determined it must be incorporated into the Environment Management System (EMS) to ensure that the correct collection timescales are adhered to.



Photo 1 – newly installed channel strip drains along one of the entrances of Unit 5.

There were significantly large stockpiles of mattresses within Unit 5. Mattress imports were stopped by the operator on 13/10/2023 to reduce the amount inside the unit. The baler has been down for several weeks due to mechanical issues but should be resolved once parts are delivered and fitted in the next couple of weeks.

Officers were able to see a fire break in between two large stockpiles with concrete blocks, however the management of the volumes within the unit must be improved. The current FPMP must be followed, an extract is taken below:

*Fire Prevention & Mitigation Plan
(FPMP) 2020*

Steel Waste Materials	Size of Concrete Bunding Block Bay Length x Width x Height (m)	Distance of Separation (m)
Mattresses	10 x 4 x 4	10



Photo 2 – mattresses within Unit 5, photo taken by Jak Rose on 17/10/2023.



Photo 3 – provided by operator Milo Thomas on 20/10/2023 showing reduction in mattress stockpile.

The wash plant is now in operation in Unit 5 and Officers were informed how it operates with the heavy materials sinking and the light fraction waste is floated out. The heavy fraction is sent to London Mining Associates (LMA) for further processing and the light fraction is sent to Trecatti

Landfill (Biffa).

At the time of the inspection the shredder was in operation to process the mattresses.

Officer ROSE was able to observe the concrete blocks that were concealed behind the internal brick wall of Unit 5. The site is now manufacturing the concrete blocks as and when they are needed.

C4 – Storage, handling, labelling and segregation – Action Only Condition 2.3

Outside area

At the time of the inspection there were some bales of cables that had been recently accepted to site. These were stored loosely and were within the permitted area. The cables were removed by 20/10/2023 and a photo showing the area clear. The operator must be reminded that there can only be *specified waste* stored outside of the building.



Photo 4 – provided by operator Milo Thomas on 20/10/2023 showing outside area.

This area has seen a vast improvement with just a small pile of 19 12 09 remaining outside which is a *specified waste*.

Outdoor areas of permitted areas show signs of wear (cracking/gaps) and therefore not fully sealed. Therefore, any storage of waste in these areas will be an issue for run-off from any wastes stored outside of the building.

The purpose of the newly installed drains would be purely to prevent loss of contaminants through the access doors of Units 5 and 6 to external storm water drains. Please be reminded that any wastes that are stored outside of the building which are not *specified waste* will not comply with the operating techniques and will breach the conditions of the permit. Please adhere to the permit

requirements and ensure activities on site reflect this.

Loading out area

This area to the rear of Unit 6 where materials are stored prior to collection and are therefore stored temporarily. This cannot be used to store material for long periods as it does not benefit from a sealed drainage system.



Photo 5 – loading out area with various wastes that are not specified waste

The use of the loading area must only be used for the temporary storage of outgoing wastes. It must not be used as an area to store wastes for longer periods as the permit does not allow these waste types as pictured unless it is *specified waste*.

Unit 6

Officers were shown the channel strip drains along the rear entrance in this building. It must be noted that as they are a sealed system, any roof leaks will need to be addressed to prevent flooding in the building. There are some sizable gaps in the roof and during heavy rainfall it may cause the system to fill quickly.

The designated area for fuel storage and oils are now situated on bund trays within the building. Spill kits are stocked and within a reasonable distance from this area.



Photo 6 – bundled trays with IBCs within Unit 6 and other chemicals placed on them.



Photo 7 – processing line within Unit 6, various fractions of metal and fines.

The entrance to Unit 6 had excessive amounts of incoming metal waste and the operator was asked to reduce this as soon as possible. This was partly due to the ongoing drainage works along the entrances within the unit, but they had recently received approximately 220 tonnes which is having to be stored temporarily due to limited access.



Photo 8 – Photo of feedstock waste in excessive amounts on 17/10/2023.

This matter was communicated before NRW Officers attended site. The operator informed the regulating officer that this is predominantly shredded downstream material 20 01 40.

It was apparent that the site had started processing the material through one end of the building, some wastes are currently being stored outside Unit 6 in the bays due to the ongoing drainage works. Once the drainage has been completed it would be expected that no wastes are stored outside unless it is *specified waste* as defined by Condition 4.4 of the permit.



Photo 9 – taken by Milo Thomas on 20/10/2023 showing reduction of feedstock waste.

The operator advised NRW on previous inspections that that due to height restrictions imposed by roller shutter doors to both units (see photo above) incoming waste may be loaded/unloaded directly in front of buildings. NRW appreciate that wastes may need to be temporarily stored outside of site buildings due to these restrictions. However, looking ahead, the operator may wish to store some wastes in a secure container as outlined earlier in the report. If it is determined that these are being stored outside in the manner that they have done previously, then it will be a breach of the permit. The agreement between NRW and the operator to store these wastes outside *temporarily* cannot be a long-term solution and therefore improvements in the infrastructure and equipment will need to be addressed.

Action required: Ensure that the Operating techniques in Condition 2.3 are always followed. If waste is stored outside, then they must be within a secure container unless they are specified waste.

Technically Competent Manager (TCM)

Mr. THOMAS holds a level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer and has recently renewed his continuing competency until 17/10/2025. Thank you for sending proof of this via email.

Waste Exemptions

The following waste exemptions are still noted as being registered by Green Steel Works Limited:

- NRW-WME047748 – Registered 10/12/2019
- NRW-WME055397 – Registered 21/09/2020
- NRW-WME073240 – Registered 14/04/2022

The regulating officer will deregister these exemptions as they are no longer being used and are not discrete from the current site activities.

Summary

The operator has made significant improvements towards the infrastructure and site operations resulting in compliance with both Regulation 36 Notices.

Please continue to provide regular updates as to the engineering work to install a sealed drainage system. Once this has been completed, please inform the regulating officer.

Officers left site at 12:00.

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.

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.