

Compliance Assessment Report CAR_NRW0044124

Permit being assessed: EP3935UC.

For: Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

At: Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/04/2024 between 10:15 and 14:00.

Parts of permit assessed: See Part 4.

NRW Lead Officer: Kirsty Thomas, accompanied by Michael Launder.

Report sent to: Helen Williams, HSE Manager, on 02/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Action only (X)	
IR2A - Installations - Operations - Permitted activities	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
IR4B	The operator to provide waste returns as required by Condition 4.2.5 of the environmental permit EPR-EP3935UC	31/07/2024
IR2A	The operator to confirm when the permit variation for the inclusion of mechanical salt slag size reduction processes on site has been submitted to NRW.	09/05/2024

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

This Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site introductory visit conducted on 25 April 2024 at Swan Alloy, Waunarlwydd Works, Waunarlwydd, Swansea, SA5 4SF for activities held by Swan Alloy UK limited (the operator) under the environmental permit EPR-EP3935UC.

Introduction

The visit purpose was for NRW's new regulatory officer (Kirsty Thomas) to have an introduction to the site.

There were no non-compliance scores recorded against the operator's permit conditions on this inspection.

Attendees

- Kirsty Thomas - Lead Specialist - Industry Regulation, NRW
- Michael Launder - Lead Specialist - Industry Regulation, NRW
- Helen Williams - HSE Manager, Swan Alloy
- Ken Britz - Plant Manager

Site introduction

At 10:15am NRW officers arrived at site and signed in via the security station. Officers were met by Helen Williams and Ken Britz and taken to a meeting room where introductions began. An overview of the visit purpose was relayed and an introduction to the site was provided by the operator. An overview was provided, including details of site's permitted activities/processes, type of customers at Swan Alloy, the SCADA system used at site, Transfrontier Shipments (TFS) of waste, waste storage limits and plans for the installation of the shredder next year.

The operator discussed the waste storage limits in more detail and presented an excel table highlighting the tonnages of salt slag in storage. The storage of salt slag has increase over the past year and moved closer to the storage limit set in the environmental permit. Through exploring other avenues, the site will be transporting salt slag from site to alternative sites for further treatment, the site should see stock levels decrease over the year to more manageable levels.

The operator also informed NRW of plans to upgrade the burners on the rotary furnace doors, with plans to install the upgrades in August and December 2024. The new burners and doors will be more environmentally friendly and reduce emissions.

Following an introduction to the site, NRW officers were taken on a tour of the site.

Site tour

NRW officers were taken around the site for familiarisation . NRW officers were shown the v-ditch that captures and channels surface water runoff. The v-ditch filter media had recently been replaced.

Several topics were discussed during the site introductions and site tour relevant to the permitted activities as follows:

- Waste - The operator was notified that they are required to start reporting information regarding non-haz waste accepted and removed from the site during the previous quarter as per Condition 4.2.5 of the permit.

Action - The operator to provide waste returns as required by Condition 4.2.5 of the environmental permit EPR-EP3935UC.

- Q1 2024 returns/Schedule 5 Notifications - The operator has recently submitted the Q1 2024 returns and notified NRW of permit breaches via Schedule 5 Notifications. The recent emission limit value breaches for the surface water discharge through emission point WA1 were discussed. Further investigation work and sampling is underway but it is thought exceedances in pollutants such as Aluminium were likely due to disturbance work caused by the improvement works around the v-ditch. New samples to be taken during next rainfall (when there will be site runoff). A separate CAR form will be issued with further details on this item.
- Complaints - Brief discussion was held around complaints received over the past few months involving plume grounding and associated odour. The operator identified other stack emission points in the area. Item to be discussed further with the operators consultants.
- A permit variation to include mechanical salt slag size reduction process to be submitted imminently (within the next week). This will entail amendments to Schedule 1- Operations (Table S1.1).

Action - The operator to confirm when the permit variation for the inclusion of mechanical salt slag size reduction processes on site has been submitted to NRW.

NRW officers left the site at approximately 2pm.

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.