

Compliance Assessment Report CAR_NRW0044533

Permit being assessed: BB3299FN.

For: SL Recycling Ltd, **held by:** SL Recycling Ltd

At: Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen, NP4 0DQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 11/06/2024 between 10:45 and 11:30.

Parts of permit assessed: See criteria assessed below.

NRW Lead Officer: Jodie Baskerville, accompanied by David Griffiths.

Report sent to: Becky Tucker, Technically Competent Manager, on 26/06/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A - Waste - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	

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?

No action required.

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

On Tuesday 11th June 2024, Natural Resources Wales Senior Waste Regulation Officer, Jodie Baskerville and South East Waste Team Leader, David Griffiths undertook a routine, un-announced inspection of the SL Recycling facility in New Inn, Pontypool. The weather at the time of the inspection was dry and cloudy.

General observations

On arrival we were met by the Technically Competent Manager (TCM) for the site, Becky Tucker, who escorted us around for the duration of the inspection. There were no outstanding actions following the last visit to the site.

The site was operational yet quiet at the time of the inspection.

Housekeeping across the site appeared to be of a good standard. It was evident that previous advice and guidance provided by NRW had been taken on board and was being implemented across all areas of the facility.

Complaints

NRW has received 12 complaints since the last inspection, which took place on the 7th May 2024. 5 of these were of noise, and 7 of odour. None of the reports were able to be substantiated. It is noted that the operator continues to respond to all reported amenity complaints in a timely manner.

No mal odours, nor excessive noise levels were witnessed throughout the duration of this inspection.

Metal Recycling

Waste metals were being stored in compliance with conditions set out in the environmental permit. Stockpile levels were below the **4m** height limit with appropriate fire breaks and separation distances observed as set out in the Fire Prevention and Mitigation Plan (FPMP) and in line with current fire prevention guidance.

Metal Shredder and deflagration events

There has been 1 deflagration (explosion) event reported since the last inspection in May 2024, though CCTV footage obtained from the site at the time of the alleged explosion shows the shredder non-operational with maintenance work being undertaken. This report was therefore unsubstantiated.

A complaint was also received following this inspection, of an explosion believed to have come from the SL Recycling Site. However, as the date and time coincided with this inspection and was not witnessed by NRW Officers on site at the time of the alleged explosion, this report was also not substantiated. Furthermore, at the time of this inspection, the shredder was not operational.

It is hoped that the new pre-shredder will be commissioned and in use by the beginning of July 2024. This should greatly reduce the likelihood of such deflagration events occurring.

The Noise Management Plan and Environmental Management System (EMS) for the site will need to be updated following this to adequately reflect activities on site.

Transfer Station

Mixed municipal waste was being appropriately stored within the Zap shelter and was compliant with limits specified by the permit.

End of life depollution

Storage and stacking of vehicle shells was being undertaken in compliance with the conditions of the permit and extracted hazardous liquids were being appropriately contained ahead of removal from site.

During the inspection it was noted that there had been a recent spill of oil or fuel from a machine working in the area. However, it was pleasing to see that the correct procedures were being followed and an operative was observed using sawdust to contain and absorb the spill.



If you have any concerns with this report, please contact Senior Officer Jodie Baskerville on Jodie.baskerville@cyfoethnaturiolcymru.gov.uk

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.

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.