

## Compliance Assessment Report CAR\_NRW0044417

**Permit being assessed:** DB3192CY.

**For:** Monometals Ltd, **held by:** Monometals Limited

**At:** 27-30 Mill Parade, Newport, Newport, NP20 2JQ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 21/05/2024 between 10:00 and 11:00.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Greg Gardner, accompanied by Jodie Baskerville.

**Report sent to:** Mr. Martyn Phillips, Technically Competent Manager, on 12/08/2024.

### 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)	
W2D - Waste - Operations - The site	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4B - Waste - Information - Reporting	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

This report details the site visit made on the 21st May 2023 to Monometals Ltd, Newport permit reference number EPR-DB3192CY.

Natural Resources Wales (NRW) Officers Greg GARDNER and Jodie Baskerville attended the Monometals Ltd site at 26-27 Mill Parade, Newport, NP20 2JQ for a first site inspection at 13:00pm where we met with Mr. Martyn PHILLIPS (Site Manager). The weather was dry, sunny and reasonably mild which it had also been the previous day.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

### **PERMIT HISTORY**

See extract from EPR-DB3192CY regarding permit history.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application PAN-021065	Duly made 20/10/23	Application for End-of-Life Vehicle Authorised Treatment Facility.
Additional information received	02/02/24	Additional information including: <ul style="list-style-type: none"> <li>• Updated Operational Techniques &amp; EMS Summary Report - ECCS 145 001 R 001 C - Feb 2024</li> <li>• Updated Environmental Risk Assessment - ECCS 145 001 R 002 C – Feb 2024</li> <li>• Updated Fire Prevention &amp; Mitigation Plan - ECCS 145 001 R 003 C – Feb 2024</li> <li>• Updated Site Layout Plan - LH023.001.D002 - Feb 2024</li> </ul>
Permit determined	08/03/2024	Permit issued to Mono Metals Limited

**COMPLIANCE BREACHES**

There are no outstanding actions or identified compliance breaches following this site visit.

**GENERAL OBSERVATIONS**

Monometals Ltd, Newport operate under a Tier 3 bespoke permit for an End-of-Life Vehicle (ELV) depollution facility. Treatment operations are limited to sorting, separation, depollution, dismantling, baling, compacting, or cutting using hand-held equipment only. All treatment activities must be carried out inside a building and must be carried out by manual methods only. All treatment is for the purpose of recovery.

The maximum quantity of waste accepted and processed on site shall not exceed 2,499 tonnes per year. There are to be no emissions to surface and/or groundwater from the buildings on site. The burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

**FIRST SITE INSPECTION**

The purpose of this site visit was for an NRW regulatory officer to undertake a first site inspection of the newly permitted waste operation as well as discuss certain topics with the operator to ensure continued constant compliance with the sites environmental permit.

The topics discussed as part of the initial site inspection in further detail included:

- How to comply with your environmental permit
- Purpose of an Environmental Management System (EMS)

- Technical competence such as obtaining a WAMITAB certificate
- Frequency and details of waste return submissions
- How compliance scoring affects subsistence fees
- What documents are held on the public register
- The site / operators waste duty of care
- Hazardous waste requirements
- Site infrastructure and maintenance requirements
- Purpose of a Fire Prevention & Mitigation Plan (FPMP)

Mr. PHILLIPS provided site tour to NRW Officers of the ELV operation which was not yet currently being undertaken due to sign off from NRW regarding a pre-operational condition that was identified during the permit application process (see image 1). The site was clean and tidy with no excessive dust, noise or odour witnessed. The site is secure with 24/7 on site security as well as multiple CCTV cameras and secure fencing.

FPMP (Fire Prevention and Mitigation Plan) preparations had been undertaken and were visible to officers such as appropriate fire fighting equipment and secondary containment measures (I.E. Bunded Wall) - see photo 2. The concrete impermeable surface was in good working condition as well as the on site interceptor system being regularly maintained.

The pre-operational condition required Monometals Ltd to construct a quarantine area for any burnt waste to be placed in the event of a fire taking place. NRW Officers witnessed this newly quarantined area and are satisfied that it meets the requirements of the pre-operational condition. Therefore, based upon this, NRW agree that ELV operations can take place at Monometals Ltd and that the pre-operation condition, as identified by NRW waste permitting during the application stage, has been met.



**Photo 1** - Inside building where ELV operations take place



**Photo 2** - Impermeable surface in good condition and secondary containment measures (background)

Table S1.3 Pre-operational measures	
Reference	Pre-operational measures
PO1	Construction of the quarantine area fire walls as specified in 'ECCS145 001 L 002 Mono Metals L Sch 5 Response Final' and 'Fire Prevention & Mitigation Plan - ECCS 145 001 R 003 C. February 2024', and in accordance with 'Fire prevention and mitigation plan guidance - Waste Management for inspection and written approval by an authorised officer of Natural Resources Wales.

**Image 1** - Pre-operational requirement identified by NRW during permit application stage



**Photo 3** - Segregation bays at Monometals Ltd with the quarantine area located on the far left

**WASTE RETURN SUBMISSIONS**

Due to the permit being issued on 08/03/24, an annual waste return is not yet required to be submitted by Monometals Ltd to NRW however, as a reminder to the operator, please see below the waste return submission deadlines. A waste return must still be submitted even if

it is a null return:

#### Waste Return Submission Deadline

Annual Return Period	Deadline
1 January to 31 December	31 January the following year

Submit your waste return -> [Natural Resources Wales / Submit your waste return](#)

#### HAZARDOUS WASTE CONSIGNMENT NOTE SUBMISSIONS

The site produces hazardous waste from the ELV treatment operations. Due to this, hazardous waste consignment notes are required, for each quarter (as below), for any hazardous waste that has been received, removed or disposed at a site. They are a compulsory requirement of the Hazardous Waste Regulations 2005. A hazardous waste return must still be submitted to NRW even if it is a null return (as above). Further information can be found on the below links:

#### Hazardous Waste Consignment Notes Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

Submit your hazardous waste return -> [Natural Resources Wales / Submit your hazardous waste return](#)

How to complete a hazardous waste consignment note -> [Natural Resources Wales / How to complete a hazardous waste consignment note](#)

NRW Officers Greg GARDNER and Jodie BASKERVILLE left site at 11.00am the same day.

If you have any issues with this report, please contact Greg Gardner on [greg.gardner@naturalresourceswales.gov.uk](mailto:greg.gardner@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.

**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](mailto: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](mailto: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.