

## Compliance Assessment Report CAR\_NRW0046019

**Permit being assessed:** FP3094VP.

For: European Metal Recycling Ltd, held by European Metal Recycling Ltd

At: Dowlais Wharf, Cardiff, Glamorgan, CF10 5ED.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 15/01/2025 between 13:30 and 14:50.

Parts of permit assessed: Part of permit assessed.

**NRW Lead Officer:** Craig Coleman, accompanied by Gareth Morris, Andrew Prestt.

**Report sent to:** Martin Crossman, Area Manager on 23/01/2025.

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

Part of permitted activity assessed (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)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	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?

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

### European Metal Recycling, Dowlais Wharf, Roath Dock, Cardiff, CF10 4ED (EPR/FP3094VP) – 15/01/2025

Environment Officers Craig Coleman, Gareth Morris, and Carriers and Brokers Officer Andrew Prestt visited the European Metal Recycling (EMR) facility at ABP Cardiff; on 15/01/2025 to undertake an unannounced site inspection to assess compliance with the sites Environmental Permit (EPR/ FP3094VP). This site operates under two permits, a Bespoke permit (ZP3795FD), and this permit which is a Standard Rules Permit which is comprised of two rulesets:

SR2009 No. 7 - Storage of furnace ready scrap material for recovery

SR2008 No. 21 - Metal Recycling Site

The site specialises in the recovery of scrap metals which are sorted and graded into metal types ahead of being sent onward for recovery. The SR2008 No. 21 ruleset allows the site to undertake treatment on waste metals imported onto site. These processes are: shearing, shredding, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery.

The site also has an S2 Exemption (NRW-WME089730) which is utilised to store Waste Electronics and Electrical Equipment on site. This is done in a distinct area which is observed by an thermal camera to monitor for any potential fires within the skips.

The site was found to be compliant with the aspects of the environmental permit that were assessed. However, care needs to be taken to ensure that compliance with the assessment of potentially hazardous waste is undertaken routinely.

#### Site Visit

The weather on the day of the inspection was fair with no rain or wind. We reported to the site office above the weighbridge upon arrival and met Mr. Kristian Mardon, a weighbridge operator and discussed our intention to inspect the site. Mr. Mardon informed us that the site and area managers were currently on their way back from a site visit at another location, but said that he was happy to accompany us on the visit. A recently appointed director, Mr. Mark Sacker also accompanied us on this visit. We were joined by Mr. Peter McCarthy, the site manager, and Mr. Martin Crossman, the area manager partway through the inspection.

Upon leaving the site office Mr. Mardon directed us to a storage area with individual bays which contained different waste metal types. The bays were well segregated with large concrete blocks. The metal stored here was mostly from the incoming trade from small scrap metal merchants. Next to this area was the unloading area for the scrap metal merchants which had several piles of waste awaiting sorting to be placed into the bays. The visit continued along the site to a concrete pad on the dockside which was undergoing resurfacing as the section had been earmarked for use for a new contract.

Following on from that there was a large bay used for the containment of large drums from a local food processing plant. The drums were crushed, and Mr. Mardon stated that they were washed prior to acceptance. This reduced the risk of pests on site and also eliminated any odour in the warmer months of the year.

At this point the ELV depollution facility was assessed for compliance. The CAR for this permit visit can be found on the public register under reference **CAR\_NRW0046015**.

The visit continued along the dockside towards the metal shearing machine. This is used to breakdown large pieces of metal prior to onward shipment. On the dockside there was a mound of waste fines from the shearing process. At this point Mr. McCarthy and Mr Crossman joined the visit. A lengthy discussion took place regarding the nature of the waste material produced as a result of shearing on site. The waste in question was destined for another EMR site for further recovery. The waste however, still needed to be tested and classified inline with [Technical Guidance WM3: Waste Classification \(WM3\)](#) guidelines. At the end of this CAR form there is guidance on how to comply with this process.

The final part of the visit took place at a section of the site that was reserved for metal cutting. Periodically EMR engages outside contractors to come in and breakdown large pieces of metal using thermal cutting equipment. This all takes place within this area. Metal is then placed in it's respective stockpile prior to onward shipment for processing.

We returned to the site office where the visit concluded.

#### **Waste Fines: (19 12 11\*/19 12 12) wastes from the mechanical treatment of waste**

Waste fines are generated as a secondary waste stream of various metal treatment and processing activities. During metal treatment processes, fine particles are created as metal pieces are cut, ground, or otherwise manipulated. These can take many forms, and at times can appear as a soil like output. The fine particles are often too small to be directly reused in primary production processes, and as such accumulate and require removal to be treated to recover what valuable material remains. These fines are potentially hazardous, and as such need to be tested to determine their waste classification. If the waste is hazardous it will require handling and consignment under the Hazardous Waste (Wales) Regulations 2005, and if not consigned for further treatment, will have to be disposed of at the standard rate for landfill due to it's hazardous properties.

#### **Waste Classification and Hazard Assessment**

1. Classify your waste fines as either 19 12 11\* (hazardous) or 19 12 12 (non-hazardous) before any movement, disposal, or recovery.
2. Conduct a thorough hazard assessment, including:
  - Identification of potential hazardous properties
  - Evaluation of persistent organic pollutants
  - Assessment of flammability potential

#### **Chemical Analysis and Hazard Evaluation**

3. Perform chemical analysis to determine the composition of waste fines, testing for:
  - Heavy metals (e.g., lead, mercury, cadmium)
  - Organic compounds
  - Other potentially hazardous substances
4. Apply appropriate hazard statement codes based on the chemical analysis results.

5. Compare concentrations of hazardous substances against WM3 thresholds to determine classification as hazardous or non-hazardous.

#### **Documentation and Management**

6. Maintain comprehensive documentation of the assessment process, including:

- Test results
- Classification rationale
- Applied hazard statement codes

7. Select an appropriate, authorized waste management route based on the classification.

#### **Compliance with Regulations**

8. Ensure compliance with the Environmental Permitting (England and Wales) Regulations 2016 for waste treatment and storage activities.

9. Adhere to WM3 guidance for proper storage, sampling, and consignment of waste:

- Store waste securely to prevent pollution
- Use appropriate containers and labelling
- Conduct regular sampling to verify waste characteristics
- Complete hazardous waste consignment notes for each movement

10. Register as a hazardous waste producer with Natural Resources Wales if you produce or store more than 500 kg of hazardous waste per year.

11. Keep detailed records of all consignment notes and waste details for at least three years.

Failure to comply with these regulations can result in severe penalties, including fines and prosecution.

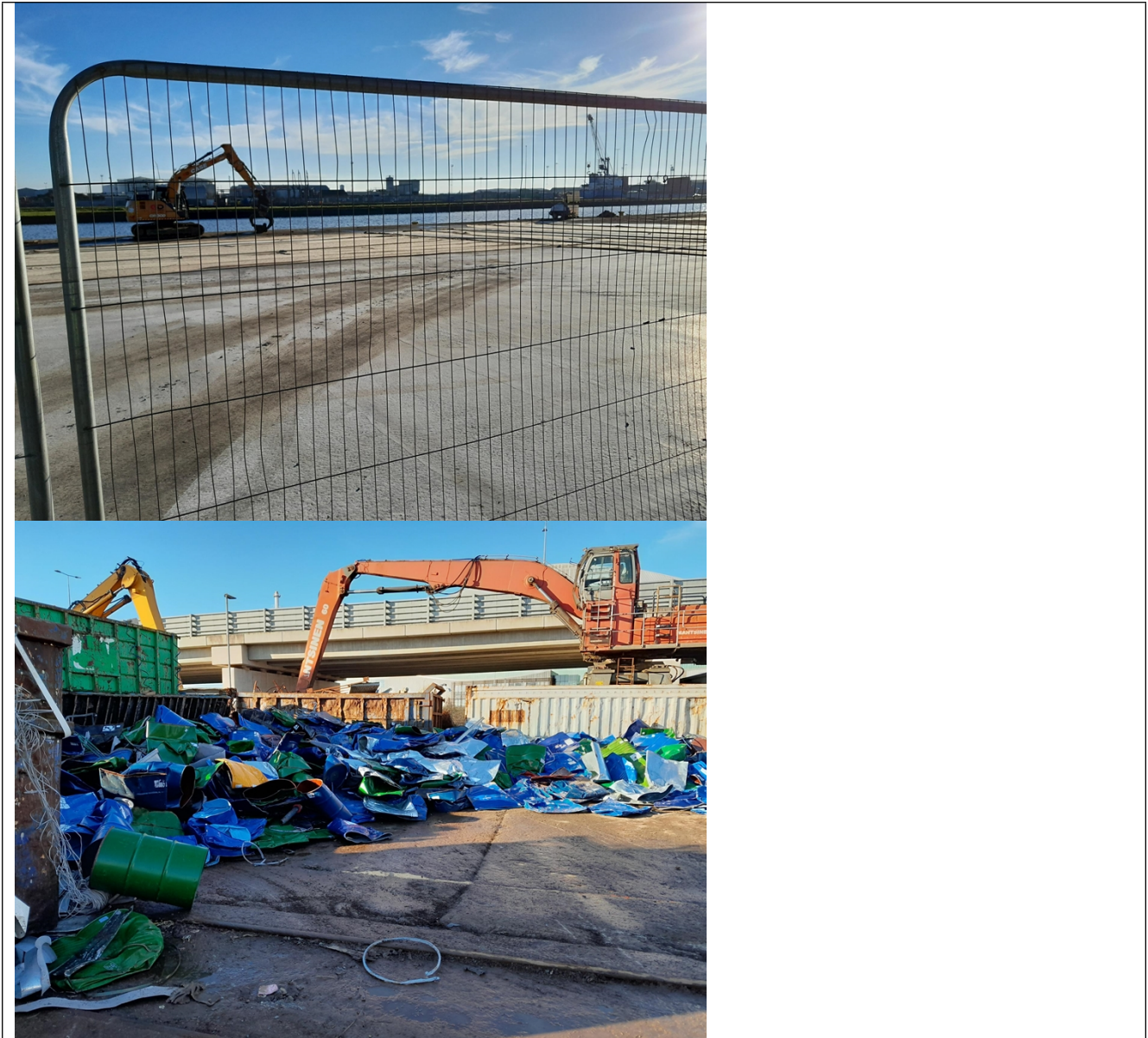
Craig Coleman

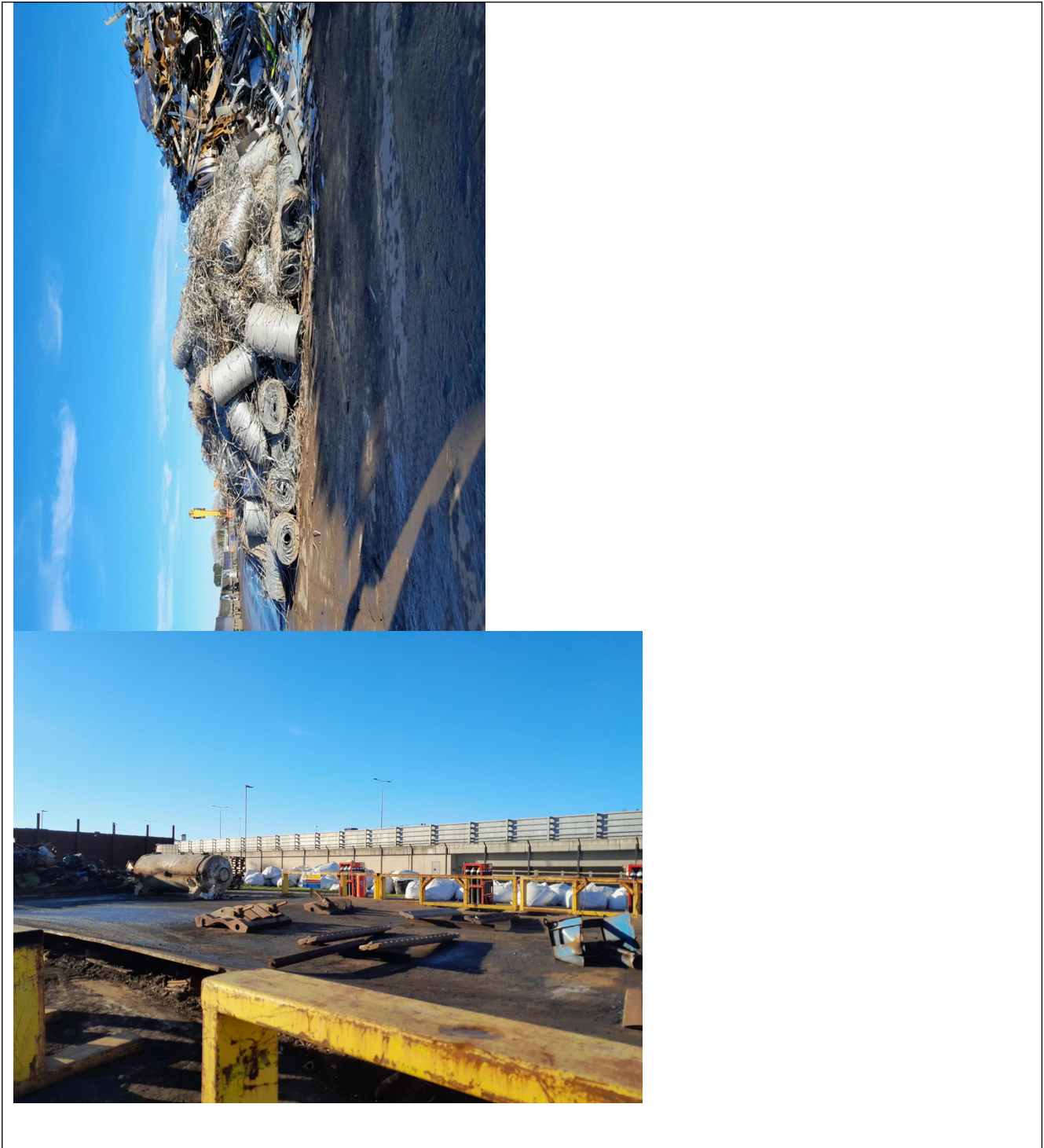
03000 65 4363

Craig.Coleman@cyfoethnaturiolcymru.gov.uk

*In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.*







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](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.