

Compliance Assessment Report

Report ID:
CAR_NRW0035092

This form will report compliance with your permit as determined by an NRW officer

Site	Ammanford Metal Recycling	Permit Ref	RP3098FM		
Operator/Permit holder	Ammanford Recycling Ltd				
Regime	Waste Operations				
Date of assessment	03/05/2019	Time in	11:00	Out	11:45
Assessment type	Audit				
Parts of the permit assessed	Site				
Lead officer's name	Lloyd, Cathy				
Accompanied by					
Recipient's name/position	Adrian Stewart/ Operator	Date issued	13/05/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C3 - General Management - Materials acceptance	X	
C4 - General Management - Storage, handling labelling and Segregation	C3	2.2.1

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Inspection carried out in response to fire that occurred on the 30 April 2019.

Adrian Stewart on site for the planned inspection.

All effort is going onto clearing the site following the fire that occurred on the 30 April 2019. The cause of the fire is unknown although initially it was thought to be deployment of air bags while transporting a non-depolluted vehicle. Our enforcement response for the fire will be made on completion of the investigation into the cause of the fire.

Because of the effort involved in clearing the site, treatment of vehicles has been postponed and this has resulted in a build-up of non-depolluted vehicles on site. As there is limited capacity to store non-depolluted vehicles at the site, vehicles were being stored on the T9 exemption area. Some of these vehicles were badly crushed. This would make depollution very difficult.



Photo 1 Non depolluted vehicles being stored on area where T9 exemption is registered.

From the fire debris it was clear that there were many burnt out vehicles that were being stored in the T9 exemption area. The T9 exemption does not authorise storage of vehicles. End of Life

vehicles must be kept separate from exempt activities. This is a breach of condition 2.2.1. Please remove all vehicles from the area where the T9 exemption has been registered.



Photo 2 burnt out vehicles seen in the background of photo, this is the T9 exemption area.

All the fire water was contained on site as an earth bund had been installed on the south western boundary. The fire water was taken to Mekatek Ltd. By Siddell Environmental Services Ltd. A hazardous waste consignment note AMR01 was supplied showing the removal of fire water.

Gas cylinders were seen to be stored at two locations on site and not in the purpose built compound located NE of site.

ACTION: Please follow your procedure Safe Systems of Work – 22 Gas Cylinders for storing gas cylinders.



Photo 3 gas cylinders were not being stored in compliance with site's procedure, *Safe system of Work 22 - Gas Cylinders*

ACTION: Please provide a copy of the waste transfer notes collected from the waste delivered to the site on the 3 May 2019.

EPR Compliance Assessment Report

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Site	Ammanford Metal Recycling	Permit Ref	RP3098FM
Operator/Permit holder	Ammanford Recycling Ltd	Date	03/05/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C3	X	Please provide a copy of all the waste transfer notes from waste accepted at the site on the 3 May 2019	27/05/2019
C4	C3	Remove ELV	27/05/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.