

## Compliance Assessment Report CAR\_NRW0046629

**Permit being assessed:** RP3098FM.

**For:** Ammanford Metal Recycling, **held by:** Ammanford Recycling Ltd

**At:** Shands Road , Ammanford, Carmarthenshire, SA18 3QU.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 18/03/2025 between 11:00 and 12:20.

**Parts of permit assessed:** General operations and TCM.

**NRW Lead Officer:** David Ellar.

**Report sent to:** Andy Evans, Compliance Manager, on 19/03/2025.

### 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)	
W2F - Waste - Operations - Technical requirements	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
W2F	Compliance Manger to clarify if correct units are in place to cover MROC2	19/04/2025

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

A routine site inspection was undertaken on Tuesday 18 March 2025 to assess compliance against Permit No: RP3098FM held by Ammanford Recycling Limited. Present at the time of the inspection were: David Ellar and Cari Jones (Natural Resources Wales) and Andy Evan, Richard Safadi, Steve (Ammanford Recycling Ltd) and Ben Rees (Geotechnology Ltd).

The weather was fine and dry.

#### **Permit breaches identified:**

No permit breaches were observed during the inspection.

#### **General Observations:**

NRW officers were accompanied around the site by Andy Evans (ARL Compliance Manager) Richard Safadi (ARL Director) and Steve (ARL site foreman). Ben Rees (Geotechnology Ltd) was also present during part of the visit.

The permit has recently been varied and the site now operates under 2 standard rules set: SR2008 No21 (metal recycling site) and SR2008 No20 (vehicle storage, depollution & dismantling (authorised treatment) facility), this is the first inspection since the variation.

The site was generally clean, tidy, well organised and good segregation of waste types were observed. The yard area was mostly clear, oily waste was in oily waste storage areas, ELV generated waste was correctly stored and bunds were clear of debris. The newly installed drainage system is fully operational, however more work on it is being undertaken; the housing of the interceptor needs to be finished off.

Recent improvements to site infrastructure, site maintenance and training of staff had been maintained and no permit breaches were observed. It was noted however that the oily waste in the oily waste storage areas (whilst stored correctly) was excessively oily, this may mean that the ELV depollution process may not be working as efficiently as it could be. Andy Evans explained he would look at the process to ensure all was as it should be and any oil spillage will be cleared up as soon as possible.

**ACTION ONLY:** review ELV depollution process to ensure it is effective and oily waste is minimised.

**EMS:**

Whilst the site has an EMS that covers the ELV operation of the site it does not yet fully reflect the recent variation to the permit and the 2 rule sets. This was discussed with Andy and Ben. ARL will amend the current EMS to reflect the recent changes to the permit. Both rule sets can be covered in the one document but separation of different requirements must be clearly laid out.

**ACTION ONLY:** Submit new EMS to NRW for review.

**ELV Depollution:**

The ELV depollution process was inspected. The depollution area has been upgraded with new kit and waste storage. The depollution process is clearly defined in the EMS and copies of the process, flow diagrams and supporting information are made visible on the wall of the depollution area for staff to refer to.

Liquid waste is removed from ELVs via vacuum pipe and feed directly into bunded tanks in a bunded area and batteries are stored in cages in the building. The bunds were clear of waste/rain water and good condition.

Photograph showing ELV waste fluid storage area:



Evidence of good practice was observed, and it was found that the ELV depollution process was compliant with the permit.

**TCM:**

Mr David Andrew Evans is TCM for the site and holds MROC1 issued 13/01/2023, which is the relevant qualification for SR2008 No21 (metal recycling site). The relevant qualification for SR2008 No20 (vehicle storage, depollution & dismantling (authorised treatment) facility) is MROC2 which is not held by Mr Evans. This was discussed with Andy on site and he believes this may be an oversight as he has ELV units in his qualification. Andy will contact WAMITAB to ensure he has the correct level of qualification for the rule sets, if not he will

ensure relevant qualifications are obtained.

**ACTION ONLY:** Contact training provider to ensure correct level of TCM certification is in place.

Thank you for your time during the inspection.

Ends.

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 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.