

Compliance Assessment Report CAR_NRW0048528

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: 29/05/2025 between 09:50 and 11:00.

Parts of permit assessed: As detailed below.

NRW Lead Officer: Jodie Baskerville, accompanied by Mark O'Gorman.

Report sent to: Becky Tucker, TCM, on 12/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	Condition 3.5.1
W1A - Waste - Management - General management	Action only (X)	
W2E - Waste - Operations - Waste acceptance	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
1	4

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
W3G	Reduce Stockpiles of wood, scrap metal and ELV's on site in	20/06/2025

Criteria	Action needed	Complete by
	line with the maximum heights of 4m specified in the FPMP for the site. Please send NRW photographs when this has been completed.	
W1A	Following the recent installation of the new electric shredder, please update your site EMS to reflect the amendment to processes on site.	18/07/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Senior Officer Jodie Baskerville, accompanied by Industry and Waste Regulation officer Mark O’Gorman, attended the permitted facility of SL Recycling Ltd on Wednesday 28th May 2025 to undertake a routine, unannounced site inspection to check compliance with the sites environmental permit, reference BB3299FN.

Officers arrived on site at 09:50 a.m. and were met by the Technically Competent Manager for the site, Becky Tucker, who escorted us round site for the duration of the inspection.

The site was operational at the time of the inspection and the weather was cloudy and dry.

Storage of waste

During the inspection, officers noted that the wood stockpile was higher than the 4 metre stack height specified by the site Fire Prevention and Mitigation Plan (FPMP) and Fire Prevention Plan Guidance.



Wood stockpile on site

Further, as a result of recent downtime, necessary to install the new electric engine to the main shredder, depolluted ELV's were also being stored higher than the maximum 4 metre stack height stipulated by the FPMP.

Condition 3.5.1 of the environmental permit states;

“The operator shall manage and operate the activities in accordance with a written fire prevention and mitigation plan using the current, relevant fire prevention and mitigation plan guidance”

A category 3 breach has been recorded against permit condition 3.5.1 under sub criteria W3G (Fire).

Action - Reduce the height of the wood stockpile and ELV Stockpile to levels not exceeding the maximum height of 4m.

Deflagration Events

There have been 2 confirmed deflagration events at the site since January 2025, both caused by gas canisters or cylinders concealed amongst incoming scrap metal waste. SL Recycling have multiple procedures in place to reduce the likelihood of such items entering machinery on site and take action against customers who deliberately disguise these amongst incoming loads.

At the time of the inspection NRW witnessed operatives on site removing two large gas canisters that had been detected as part of the checking process. Incoming loads are inspected for any non-conforming wastes and are additionally spread out on the ground prior to entering the pre-shredder,

for further visual inspection by an operative stationed at the point the scrap metal is fed in.



Gas canisters found concealed in waste

Complaints

At the time of this inspection, NRW had received 30 reports from members of the public since January 2025. Whilst the majority of these (24 reports) related to a confirmed deflagration event in February, there were also reports of noise, odour and smoke from the site. As detailed above, two deflagration events were substantiated, and following investigation, NRW were satisfied that all appropriate procedures were followed correctly and no conditions of the permit were breached as a result.

During the inspection, NRW Officers observed an transient odour, similar to laundry detergent. This odour was mild and intermittent and at the time of the inspection, could not be attributed to any activities taking place on site.

Whilst on site NRW officers did not experience any noise levels above what would be expected to be generated by the operations taking place. Further, the recent addition of the electric engine to the main shredder should further reduce operational noise levels.

General Observations

At the time of the inspection, operatives were in the process of isolating some non-conforming wastes that had been identified during routine checks. The waste was suspected of containing hazardous properties and the customer was unable to prove otherwise. Subsequently as per site protocol, procedures to return the waste were being initiated.

Since the last inspection, a new electric engine had recently been added to the main shredder. Whilst currently being powered by generators, it is hoped that connection to the main electricity grid

will take place by the end of July 2025. In addition to reducing carbon emissions and thus improving local air quality, the reduction in noise pollution as a result of using an electric motor as opposed to a diesel powered engine, will hopefully positively impact the surrounding businesses and local residents.

Action - Ensure the site EMS is updated following the installation of the new equipment and an updated copy forwarded to NRW.

All other operations on site were being undertaken in line with permit conditions and no further breaches were recorded during the inspection.

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

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.