

Compliance Assessment Report CAR_NRW0048968

Permit number	CB3393ZB	Operator name	GLJ Recycling Limited
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Site name	GLJ Recycling Limited
Site address	Lower Chapel Bridge Yard, Cwmcarn, Cross Keys, Newport, NP11 7NL
Assessment type	Other

Date of assessment	14 June 2024	Time in	N/A	Time out	N/A
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Parts of permit assessed	See Part 4
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NRW Lead officer	Guy Baskerville	Accompanied by	N/A
Report sent to – Name and position	[REDACTED] Director	Date	28 July 2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR1A - Management - General management	C3 Minor	1.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

2. What action is required?

Criteria	Action needed	Complete by
IR1A - Management - General management	The operator shall submit to Natural Resources Wales for approval within the period specified, a comprehensive and robust deflagration management plan in addendum to the written management system. The plan shall include, as a minimum, the requirements set out in BAT 27a, BAT26a and BAT26b. The operator shall implement the approved deflagration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.	25/08/2025
IR1A - Management - General management	The operator shall provide evidence that the primary shredder is equipped with pressure relief dampers and that they are fully operational.	25/08/2025
IR2C - Operations - Operating techniques	The operator shall review and revise its Noise and Vibration Management Plan in order to consider all potential noise impacts from site operations. As part of this action, a distinct and separate Noise and Vibration Management Plan from the Amenity Management Plan shall be created.	27/10/2025

Action 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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter *NRW*) findings following an assessment of the appropriateness of measures to minimise the frequency of deflagration events occurring as a result of permitted waste treatment activities.

Regulatory Context

Deflagrations are a recognised issue at scrap metal shredding operations, that can have potential or actual impacts on the environment and human health. They typically occur where compressed gas containers or other fuel containers are unintentionally fed into scrap shredders, are pierced and explode, causing an extreme impulse sound (i.e. a bang) and pressure waves. A deflagration may also have a short term, localised detectable impact on air quality caused by emissions from combusted fuels or the mobilisation and ejection of contaminated dusts by the sudden pressure change. Deflagrations also have serious health and safety implications for the workforce and may cause considerable damage to plant and other infrastructure.

There have been 10 deflagrations in 2025 to date, including 3 over a period of 7 days between May 31 and 06 June. This is a notable increase in frequency, suggesting that the risk of deflagrations is not being managed appropriately.

The European Commission published the Best Available Techniques (BAT) Reference document (hereafter *the BRef*) for the Waste Treatment sector on 17 August 2018. The BAT Conclusions described therein determine the reference points used to set conditions in environmental permits which authorise waste treatment installations. Permit holders must be able to demonstrate that relevant BAT conclusions and any associated Emission Limit Values (ELV) are being met.

Deflagrations are addressed by BAT Conclusion 27. BAT 27 is reproduced below.

In order to prevent deflagrations and to reduce emissions when deflagrations occur, BAT is to use technique a. and one or both of the techniques b. and c. given below.

Technique	Description	Applicability
a Deflagration management plan	<i>This includes:</i> <i>• a deflagration reduction programme designed to identify the source(s), and to implement measures to prevent deflagration occurrences, e.g. inspection of waste input as described in BAT 26a, removal of dangerous items as described in BAT 26b;</i> <i>• a review of historical deflagration incidents and remedies and the dissemination of deflagration knowledge;</i> <i>• a protocol for response to deflagration incidents.</i>	<i>Generally applicable.</i>
b Pressure relief dampers	<i>Pressure relief dampers are installed to relieve pressure waves coming from deflagrations that would otherwise cause major damage and subsequent emissions.</i>	

c	Pre-shredding	Use of a low-speed shredder installed upstream of the main shredder	Generally applicable for new plants, depending on the input material. Applicable for major plant upgrades where a significant number of deflagrations have been substantiated.
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BAT 26a and BAT 26b (referenced in table above) are reproduced below.

In order to improve the overall environmental performance, and to prevent emissions due to accidents and incidents, BAT is to use BAT 14g and all of the techniques given below:

- a. implementation of a detailed inspection procedure for baled waste before shredding;*
- b. removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive items).*

BAT 14g (referenced above) is not relevant in the context of deflagrations.

Deflagration management

Deflagration reduction is discussed in a number of distinct operational procedures submitted alongside the environmental permit variation application submitted in 2019, including, but not limited to:

- Fire Management Plan Version 2
- Amenity Management Plan
- Best Available Techniques
- EMS3.8 Procedure - Material handling and processing

However, no defined deflagration management plan exists in the context of BAT 27, and the above listed procedures do not appropriately address all the elements set out in BAT 27, BAT 26a or BAT26b.

This represents non-compliance with the environmental permit as the risks of pollution from operations and non-conformances have not been minimised using BAT.

Condition 1.1.1(a) of the environmental permit states:

The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and*

As a result of this non-compliance a CCS Score [C3] has been recorded against compliance sub-criteria IR1A - General management

A C3 score has been levied as it is reasonably foreseeable that non-compliance with permit condition 1.1.1(a) will result in a minor pollution of the environment.

Action 1: The operator shall submit to Natural Resources Wales for approval within the period specified, a comprehensive and robust deflagration management plan in addendum to the written management system. The plan shall include, as a minimum, the requirements set out in BAT 27a, BAT26a and BAT26b. The operator shall implement the approved deflagration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

Condition 1.1.1(b) of the environmental permit states:

*The operator shall manage and operate the activities:
(b) using sufficient competent persons and resources.*

Site operatives executing the measures described in the deflagration management plan must be appropriately trained in those measures. There must also be sufficient personnel available to effectively execute those measures. Training and resourcing will be the subject of a future compliance intervention, to be undertaken later this year.

Pressure relief dampers

Supporting information, submitted alongside the most recent permit variation application, stated that the primary shredder is equipped with pressure relief dampers.

Action 2: The operator shall provide evidence that the primary shredder is equipped with pressure relief dampers and that they are fully operational.

Pre-shredding

The operation benefits from a pre-shredder (installed in 2022) for the pre-treatment of loose scrap and a mechanical shear (installation predates permit variation) for the pre-treatment of baled scrap and oversized scrap.

The observed increase in frequency of deflagration events in 2025, despite the operation benefitting from a pre-shredder and mechanical shear, indicates that existing deflagration prevention procedures are not appropriate in adequately preventing or minimising deflagrations. Actions presented above seek to redress this by bringing the operation into compliance with relevant BAT.

Noise Management Plan

We note that it has been a number of years since your Noise and Vibration Management Plan (part of your Amenity Management Plan) was reviewed. A number of operational changes, including additional fixed plant and waste treatment processes, have been introduced in recent years.

If a noise pollution incident is substantiated by Natural Resources Wales and your plan and measures used are not deemed appropriate - non-compliance(s) scores may be levied and we may take legal action against you.

Action 3: The operator shall review and revise its Noise and Vibration Management Plan in order to consider all potential noise impacts from site operations. As part of this action, a distinct and separate Noise and Vibration Management Plan from the Amenity Management Plan shall be created.

Guidance in relation to noise management plans and noise impact assessments may be found by following the link below.

[Noise and vibration management: environmental permits - GOV.UK](https://www.gov.uk/guidance/noise-and-vibration-management-environmental-permits)

[END]

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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 Industry compliance criteria (used in section 1 and 2):

1 - Management

- IR1A - General management
- IR1B - Finance (only applicable to Landfill)

- IR1C - Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2 - Operations

- IR2A - Permitted activities
- IR2B - The site
- IR2C - Operating techniques
- IR2D - Technical requirements
- IR2E - Improvement programme
- IR2F - Pre-operational conditions
- IR2G - Landfill engineering (only applicable to Landfill)
- IR2H - Waste acceptance (only applicable to landfill)
- IR2I - Leachate levels (only applicable to Landfill)
- IR2J - Closure and aftercare (only applicable to Landfill)
- IR2K - Landfill gas management (only applicable to Landfill)

3 - Emission and Monitoring

- IR3A - Emissions to water, air or land
- IR3B - Emissions of substances not controlled by emission limits
- IR3C - Odour
- IR3D - Noise and vibration
- IR3E - Monitoring
- IR3F - Pests
- IR3G - Air quality management plans
- IR3H - Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I - Fire

4 - Information

- IR4A - Records
- IR4B – Reporting
- IR4C - 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 – 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.