

Compliance Assessment Report CAR_NRW0051238

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: 18/03/2026 between 09:45 and 10:40.

Parts of permit assessed: Detailed below.

NRW Lead Officer: Nicola Rossiter, accompanied by Jodie Baskerville.

Report sent to: Becky Tucker, Technically Competent Manager, on 01/04/2026.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1
W2C - Waste - Operations - Operating techniques	Assessed (A)	
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)	
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.5.1

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

Total non-compliances recorded	Total non-compliance score
2	8

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
W1A	Provide NRW with an up to date certificate of Technical Competence.	30/04/2026
W2A	Ensure that the impermeable surface is repaired to prevent water pooling. Please provide NRW with photographs when this is completed.	31/05/2026
W3G	Reduce the height of the general waste in line with the maximum height of 4m, specified by the FPMP for the site. Please provide NRW with photographs when this has been actioned.	30/04/2026

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

PERMIT INSPECTION

On the 18th March 2026 Industry and Waste Officer Nicola ROSSITER and Senior Officer Jodie BASKERVILLE attended the SL Recycling facility at New Inn (EPR-BB3299FN) for an unannounced, routine site inspection.

Officers arrived on site at 09.45 am. The site's Technically Competent Manager, Becky TUCKER accompanied officers around the site for the duration of the inspection. The site was operational at the time of the inspection and the weather was fine and dry.

PERMIT BREACH

During the inspection, NRW officers identified an area of the site showing signs of significant water pooling, as evidenced in Photographs 1 and 2. To maintain full compliance with the permit, all impermeable surfaces must be kept in a condition that prevents deterioration. This includes ensuring that no cracks, holes, or areas of substantial water pooling are present, as such defects may compromise the impermeability of the surface.



Photo 1 & 2. Photo of area where impermeable surface is allowing pooling water

W2A General Management – Category 3 breach

Condition 2.1.1 of the permit states;

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

Table S1.1 of the permit states;

Table S1.1 activities

Activity reference	Description of activities for waste operations	Limits of activities
A1 – Mixed metal recycling activity including end of life vehicle de-pollution	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>D15: Storage pending any of the operations</p>	<p>All hazardous and non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage.</p> <p>The maximum quantity of hazardous waste that can be stored at the site in total for recovery or disposal, (excluding end of life vehicles and/or waste electrical and electronic equipment stored pending manual dismantling, repair or refurbishment), shall not exceed 50 tonnes at any one time.</p>

A category 3 breach has been recorded against permit condition 2.1.1 under sub criteria W2A General Management.

Action – Ensure that impermeable surface is repaired to prevent water pooling.

During the inspection, NRW officers also observed that the general waste stockpile exceeded the 4-metre maximum stack height specified in the site’s Fire Prevention and Mitigation Plan (FPMP) and the Fire Prevention Plan Guidance, as evidenced in Photograph 3.



Photo 3. Stockpile of general waste on site

W3G Fire – Category 3 (C3) breach

Condition 3.5.1 of the environmental permit states;

3.5.1 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 general waste to ensure that stockpile levels do not exceed maximum height of 4m.

PREVIOUS INSPECTIONS

Compliance Assessment Report (CAR) ID CAR_NRW0048528, issued following the site inspection undertaken on 29/05/2025, identified two actions:

1. to reduce the stockpiles of wood, scrap metal and ELVs to ensure they were brought back into compliance with the requirements of the site's Fire Prevention and Mitigation Plan (FPMP), and
2. to update the Environmental Management System (EMS) to reflect the installation and operation of the new electric shredder.

During the most recent inspection, officers noted that the stockpiles of wood, scrap metal and ELVs had been reduced to levels consistent with the maximum heights and storage arrangements set out in the FPMP. This improvement is evidenced in Photograph 4. NRW is satisfied that this action has been fully complied with.



Photo 4. Wood stockpile height

NRW has also received an up to date EMS and now considers this action complied with.

GENERAL OBSERVATIONS

The depollution area is located undercover and situated on an impermeable surface, in accordance with the conditions of the permit. This area was observed to be well maintained. During the inspection, NRW officers witnessed the implementation of

spill-mitigation measures in response to a minor spill on the impermeable surface, demonstrating good practice and appropriate management of pollution risks, as shown in Photograph 4.



Photo 4. Sawdust being used to contain a small spill

The operator confirmed that the updated procedures relating to the management of gas cylinders have been effective in preventing unauthorised deflagration incidents. These measures include imposing charges on customers who attempt to conceal gas cylinders within loads and employing a dedicated staff member to sort through incoming waste to identify any cylinders present. All identified cylinders are segregated and stored separately prior to removal from the site, as evidenced in Photograph 5.



Photo 5. Segregated gas cylinders

All other activities observed on site were being carried out in accordance with the conditions of the permit, and no additional breaches were identified during the inspection. No offensive odours were detected by any officer while on site. Noise levels observed during the inspection were consistent with those normally associated with the site's authorised operations and did not give rise to any concerns regarding excessive, unreasonable, or offensive noise.

Officers ROSSITER and BASKERVILLE left site at 10.30 am.

WAMITAB

The Technically Competent Manager for the site is Becky Tucker who holds a current certificate at the time of the inspection. Please send an up to date certificate to NRW.

WASTE RETURNS

Waste Returns were up to date and within waste acceptance limits, thank you. Please continue to submit them in a timely manner.

REQUIRED ACTIONS

1. Reduction of General Waste Stockpile

Reduce the height of the general waste stockpile to ensure full compliance with the maximum 4-metre stack height specified in the site's Fire Prevention and Mitigation Plan (FPMP).

Please provide NRW with photographic evidence once this action has been completed.

Deadline: 30/04/2026

2. Repair of Impermeable Surface

Ensure that the affected impermeable surface is repaired to prevent water pooling and to maintain the surface in accordance with permit requirements.

Please provide NRW with photographic evidence once the repair works have been completed.

Deadline: 31/05/2026

3. Technical Competence Certificate

Provide NRW with an up-to-date copy of the site's certificate of Technical Competence.

Deadline: 30/04/2026

CONTACT DETAILS

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Nicola ROSSITER, Waste Regulation Officer, nicola.rossiter@cyfoethnaturiolcymru.go.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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.