

Compliance Assessment Report

Report ID:
CAR_NRW0036048

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

Site	G L J Recycling Limited	Permit Ref	DB3097TJ		
Operator/Permit holder	G L J Recycling Limited				
Regime	Waste Operations				
Date of assessment	21/11/2019	Time in	10:30	Out	11:45
Assessment type	Site Inspection				
Parts of the permit assessed	Various				
Lead officer's name	Lee, Jonathan				
Accompanied by	Bowder, Alex				
Recipient's name/position	Gareth Jones, Colleen Andrews/ Director, Accounts Manager	Date issued	09/12/2019		

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
D2 - Incident Management - Accidents, emergency and incident planning	C3	3.4.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	X	

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

Compliance Assessment Report – EPR/DB3097TJ

Officers Jonathan Lee and Alex Bowder in attendance of GLJ Recycling Limited, Cwmcarn to complete an inspection of the environmental permit **EPR-DB3907TJ**. Weather was cool with light rain. Officers met with company director Mr Gareth Jones and Accounts Manager Colleen Andrews.

This permit currently comprises the following standard rulesets: -

- SR2008 No20 – Vehicle storage, depollution & dismantling (authorised treatment) facility
- SR2008 No21 – Metal recycling site

This report considers a visit made by officers Richard Palmer and Alex Bowder on the 8th Oct 2019. This report also considers a site visit made by officers Alex Bowder and Jonathan Lee on the 21st November 2019. The visit on the 21st November was made to complete a routine inspection of the permitted area, obtain an update in relation to the actions specified in the audit report complete by officer Alex Bowder (dated 26th June 2019) and complete a handover to your new regulatory officer Jonathan Lee.

The actions stipulated in the audit report completed by officer Alex Bowder dated 26th June 2019 and relating to the environmental permit **EPR/DB3097TJ** are given in the table below, a third column 'Status' has been added indicating whether this action has been completed or not.

Audit Report Actions – 26th June 2019

ACTION	DEADLINE	STATUS
- Bring down the heights of all Stockpiles exceeding 4 metres in height.	26 July 2019	Complete

- Do not store material up against site boundary and establish 360-degree access to all piles.	26 July 2019	Incomplete
- Update the business' EMS to reflect the correct procedures for the classification of waste.	26 August 2019	Complete
- Submit any outstanding Waste Return Documents for this permit within the grace period given. Put in place measures to see that they are submitted within the grace period.	Immediately	Complete
- Submit hazardous waste consignment note for appropriate wastes in future.	Immediately	Complete

Site Visit – 8th October 2019

During the visit made by officers Alex Bowder and Richard Palmer on the 8th October it was noted that: -

- Various stockpiles of waste metal were stored above four metres in height and against the site boundaries (see photos 1 and 4). It was stated that this was due to the installation of a new shredder on site, the site had lost about 30% of its capacity.
- A stockpile of waste was stored directly adjacent to the ELV unit, there was no clear fire break between the waste and the building (see photo 3).
- There were a few patches of impermeable pavement which required repair.
- A stockpile of iron fines stored in a bay at the northern end of the site had rusty water collecting at the bottom of the pile, officers were concerned over the potential for this contaminated run-off to exit the site not via the new interceptor which had been recently installed (see photo 2).
- Due to the installation of the new shredder machine, the site wouldn't return to 'normal' operations until February 2020.



Photo One – Stockpile exceeding 4 metres high



Photo Two – Pooling of contaminated water



Photo Three – Stockpile against ELV unit



Photo Four — Stockpile exceeding 4 metres high

Site Visit – 21st November 2019

During the visit made by officers Alex Bowder and Jonathan Lee on the 21st November it was noted that: -

- Various stockpiles of waste metal were being stored against the site boundary (and therefore did not afford 360-degree access in the event of an incident), it was noted that this was due to the installation of a new shredder on site. However, stockpiles of waste were mostly being stored below four metres in height.
- Patches of impermeable pavement requiring repair, were being repaired at the time of inspection. Other patches requiring minor attention were due to be repaired over the Christmas period.
- The building used for depollution of End of Life Vehicles was operationally quiet due to site operations being focused on the installation of new shredder. The site now typically focuses on the processing of depolluted ELV shells/bales, and input of non-depolluted ELV's is minimal.
- The old shredder was in the process of being removed from the site.
- Due to the installation of the new shredder machine, the site wouldn't return to 'normal' operations until February 2020.

Compliance Breaches

The following permit breaches were identified during the inspection.

D2 Incident management – Category 3 breach – Permit Condition 3.4.1

Permit condition 3.4.1 states that the operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention and mitigation plan (FPMP) guidance.

During the inspection on the 8th October, it was evident that several stockpiles of waste exceeded 4 metres in height. In addition, the stockpile of waste closest to the office on site was being stored adjacent to the site fencing and the boundary.

During the inspection on the 21st November, it was evident that the stockpile of waste closest to the office on site was being stored adjacent to the site and the boundary.

Whilst it is understood that the storage techniques of waste at the time of the inspection(s) were due to the installation of a new shredder, a **Category 3 breach** of permit condition 3.7.1 has been recorded as there is perceived risk of a fire-related incident, and the storage techniques described in your FPMP.

Actions: -

- Do not store waste against site boundary
- Establish 360-degree access to all stockpiles

Deadline: Monday 2nd March 2020

G4 – Monitoring and reporting to Natural Resources Wales – Action only

Annual waste returns have been submitted on time. However, an outdated spreadsheet has been used. A copy of the new template waste return spreadsheet can be found at the link below. Please ensure that the new template is used in future waste return submissions.

<https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/operator-waste-return-and-deadlines-for-returns/?lang=en>

Action: - Use updated waste return template for future waste return submissions.

Summary

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Jonathan Lee on 0300 065 3908, or via email at jonathan.lee@naturalresourceswales.gov.uk

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.

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EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036048**

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Site	G L J Recycling Limited	Permit Ref	DB3097TJ
Operator/Permit holder	G L J Recycling Limited	Date	21/11/2019

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
G4	X	Use updated waste return template for future waste return submissions.	31/01/2020
D2	C3	Do not store waste against site boundary. Establish 360-degree access to all stockpiles.	02/03/2020

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.