

Compliance Assessment Report

Report ID:
CAR_NRW0035631

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

Site	European Metal Recycling Ltd	Permit Ref	ZP3795FD			
Operator/Permit holder	European Metal Recycling Ltd					
Regime	Waste Operations					
Date of assessment	13/08/2019	Time in	14:30	Out	15:15	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Bowder, Alex					
Accompanied by						
Recipient's name/position	Nicola Rushton, Daniel Latner, Martin Crossman / Environmental Coordinator, Site Manager. TCM		Date issued	11/12/2019		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	

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	0	Total compliance score (see section 5 for scoring scheme)	0
-----------------------------	---	---	---

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

Officer Alex BOWDER attended European Metal Recycling Limited (EMR), Dowlais Wharf at 14:30 on Tuesday 13th August 2019 to carry out an introductory inspection of permit **EPR/ZP3795FD**. Met with business representatives Nicola Rushton and Daniel Latner who showed the Officer around the permitted area and explained the operational procedures on site. The weather conditions were warm and dry at the time of visit.

To remind the business following each visit, Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1** - Major, serious persistent and/or extensive impact on the environment/people/property
- 2** – Significant impact on effect on the environment/people/property
- 3** – Minor impact or effect on the environment/people/property
- 4** – A non-compliance which has no potential environmental effect

PREVIOUS CAR FORM ISSUES

- Expired WAMITAB qualification

- Damaged infrastructure flooring in need of repair
- Submission of Waste Returns documents

GENERAL OBSERVATIONS

EMR have two Standard Rules Permits under one permit number **EPR/FP3094VP**:

- SR2009No7 for the storage of furnace ready scrap metal for recovery and
- SR2008No21 for a metal recycling site.

Environmental Permit **EPR/ZP3795FD** was issued as a Waste Management Licence (30322) on 14 November 2005 as an End-of-life Vehicle Authorised Treatment Facility (ATF). The Environmental Permit **EPR/FP3094VP** was issued on 26th February 2010 and authorises the same area for the storage of furnace ready scrap under a set of Standard Rules. This permit was varied on 01 December 2011 to add a further set of standard rules for metal recycling.

Status log of the permit		
Description	Date	Comments
Waste Management Licence issued EAWML 30322	14/11/05	Original licence issued to European Metal Recycling Limited for a vehicle depollution and dismantling (authorised treatment facility).
Variation determined EPR/ZP3795FD/V002 (formerly EAWML 30322)	07/11/08	Regulator initiated variation to amend Waste Electronic Electrical Equipment (WEEE) conditions.
Variation determined EPR/ZP3795FD/V003	11/12/09	Variation to amend interpretation in Waste Electronic Electrical Equipment (WEEE) variation carried out in 2008.
Part surrender application EPR/ZP3795FD/S004	Duly made 24/07/15	Application to surrender of an area of land only.
Part surrender determined	12/11/15	Part surrender complete, and consolidated, modern permit issued to reflect reduced permitted area.

During the inspection there were no waste vehicles on site being depolluted. The depollution unit is undercover and benefits from an impermeable surface. Extracted batteries are stored in an appropriate sealed container. All associated wastes (i.e. hazardous oils, coolants etc) were contained within an undercover bunded area to the right of the depollution area. No breaches were recorded during the inspection.

Vehicles are raised on the depollution bay and hazardous liquids drained by puncturing the areas and letting drain via gravity or suction tanks. No issues within the drainage system or the infrastructure for the unit.

Technically Competent Manager (TCM)

The designated TCM for the site is Mr. Martin Crossman. The site has supplied NRW with the valid WAMITAB certificate that states the modules completed - Metal Recycling Sites and End of Life Vehicles. This qualification has an expiry date of 12/01/2020 - please ensure a continuing competency is completed when this date is up.

ENVIRONMENT MANAGEMENT SYSTEM (EMS)

It has been stated that the business' EMS comprises a number of documents and systems. This document should outline how you are going to run the site and comply with your permit conditions. It should be tailored to your permit and ideally be a separate document from general operational procedure notes, for instance.

NRW aim to focus on this next inspection.

FIRE PREVENTION AND MITIGATION PLAN (FPMP)

The site has submitted the most current version (June 2019) of its FPMP to NRW. **We intend to complete a separate assessment of your FPMP which will be evaluated in due course.**

Table 2 Combustible Materials: Maximum Quantity and Duration Limits states that all waste types all stockpiles have a maximum storage time of three months. Tyres are stored for a period of up to 5 months – please monitor this waste stream and ensure they are not kept on site for extended periods of time.

I look forward to working with the site in future.

If you have any issues with this report, please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035631**

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

Site	European Metal Recycling Ltd	Permit Ref	ZP3795FD
Operator/Permit holder	European Metal Recycling Ltd	Date	13/08/2019

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.

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			

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.