

Compliance Assessment Report

Report ID:
CAR_NRW0036452

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

Site	SL Recycling Ltd	Permit Ref	BB3299FN			
Operator/Permit holder	SL Recycling LTD					
Regime	Waste Operations					
Date of assessment	05/03/2020	Time in	10:30	Out	11:30	
Assessment type	Site Inspection					
Parts of the permit assessed	Various					
Lead officer's name	Burge, Chris					
Accompanied by	Bowder, Alex					
Recipient's name/position	Steve Morgan / TCM	Date issued	13/03/2020			

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
B4 - Infrastructure - Containment of stored materials	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	

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
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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

Officers Chris BURGE and Alex BOWDER attended at SL Recycling Limited at Unit 1, Pontyfelin Industrial Estate, New Inn, Pontypool, Torfaen Estate at 10:30 on Thursday 05 March 2020 to carry out a site inspection of the permit **EPR-BB3299FN**. Officers met with Technically Competent Manger Steve MORGAN and Director Stacy LEWIS. They accompanied Officers around the site and discussed improvements and changes made since previous inspection. The weather was dry and overcast at the time of the visit. No permit breaches were recorded for this inspection.

PREVIOUS CAR FORM ACTIONS

CATEGORY 3 BREACH

C4 - General Management - Storage, handling labelling and Segregation

Permit condition - 2.3 Operating techniques

At the time of the inspection, it was evident that the general waste was protruding out from the building structure, as seen in photograph below. This is due to excessive tonnages of mixed waste being stored at the time of inspection.

This has been rectified at the time of the site inspection on 05 March 2020. All general waste was stored under the canopy at the time of inspection.

As discussed on site, all wood waste needs to be stored and processed with in a building to comply with your permit. Again, we require this be rectified by 02 March 2020. Explained options:

- 1) Vary your waste permit to apply for compliant storage methods (outside a building)*
- 2) Move wood waste in a building for storage and processing*
- 3) Remove wood waste from site*

The wood on site has been removed at the time of the visit on 05 March 2020. A small amount of saw

dust was left with the intention to be used for pollution prevention and bund reinforcing under a U1 Waste Exemption. The registration number is

Officers highlighted the bits of plastic present in the material to be removed before capping.

ENVIRONMENT MANAGEMENT SYSTEM (EMS)

Condition 1.1.1 of your permit requires you to operate the site in accordance with a written Management System. This document should outline how you are going to run the site, whilst assessing risk to the environment and complying with your permit conditions.

Please can the Operator submit an up-to-date Environment Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP) by 02 March 2020. These documents will then be assessed by NRW once received.

This has been sent in and will be assessed in due course.

GENERAL OBSERVATION

The general condition of the site has improved. You were in the process of constructing a depollution bay for End-of-Life vehicles and using hardcore rubble on site to build up the ground level, prior to creating a solid concrete working area. The business intends to erect bay walls which will assist with the separation and segregation of waste streams. No odour or amenity issues were noticed by Officers at the time of inspection.

It was discussed that you have recently had a specialist company at site to check your drainage and to look at an appropriate pump to prevent flooding on site. This had been agreed and was going to be installed shortly which would work automatically if water levels on site raise and pump in to the lagoon, before entering the interceptors on site. This is discharged via your discharge consent with Welsh Water.

WASTE Returns

we have received last periods waste return and the next period ends on the 31st March 2020

If you have any queries regarding this Compliance Assessment Report, please contact Regulatory

Officer Chris BURGE on 0300 065 3904, or via email at chris.burge@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.

EPR Compliance Assessment Report

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CAR_NRW0036452**

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Operator/Permit holder	SL Recycling LTD	Date	05/03/2020

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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.