

Compliance Assessment Report

Report ID:
CAR_NRW0036378

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

Site	Celsa Swansea Scrap Yard	Permit Ref	AB3891FT			
Operator/Permit holder	Celsa Manufacturing (UK) Ltd					
Regime	Waste Operations					
Date of assessment	05/02/2020	Time in	11:10	Out	12:00	
Assessment type	Audit					
Parts of the permit assessed	Site Boudnary and Operations					
Lead officer's name	Wakeford, Sally					
Accompanied by	Kinhead, James					
Recipient's name/position	Craig Stevens/ Assistant Operations Manager	Date issued	20/02/2020			

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
A1 - Specified by permit	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	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

On 05 February 2020 a routine site inspection was undertaken by Sally Wakeford, James Kinhead and Ethan Banfield (NRW Permitting Officer).

Craig Stephens, Assistant Operations Manager and Technically Competent Manager, accompanied officers around the site. Craig's Wamitab certificate was provided and was issued on 08/07/2019.

Site Boundary Changes & Drainage:

Since the previous inspection, the site has increased the boundary of the permit to allow the movement of the shears to free the dockside up for shipments of waste. The permit requirements for the permitted area is listed in Schedule 1 – Operations as:

Discharge of integral site drainage (process effluent) from the emission point indicated on the plan in Schedule 7 of this permit.

Drainage consisting of solely clean, rainfall dependant run-off from the impermeable surface from areas of the site used to store and/or treat waste via a full retention, 5 chamber oil/water interceptor.

No visible oil, grease or suspended solids shall be resent in the discharge.

The area around the new section of site has been bunded, except where the gateways are present and one small section in the South Easterly corner of the site.

ACTION: Please confirm why this section has not been bunded.





The fall of the site in the new area which will contain the processing plant falls to the South Easterly corner of the site, away from the main drainage of the site. The options for drainage were discussed, and it was agreed that the rainfall dependant run off from the processing would be collected in a sump, and then pumped and tankered to the other side of the site to be released through the current drainage system and through the current discharge point. The option for a new interceptor for this area to discharge through a further discharge point is cost prohibitive.

The section of drainage channels which have been fitted at the far side of the site will capture the water run off from the processing area. There will be sandbags and spill kits placed in this area to aid incident response to a spill to reduce the amount of oil/fuel entering the sump.



You informed us that no waste shall be stored from the ridgeline of the new area which drains away from the new sump, this will be the roadway to access the site and staff/visitor parking only. This differs from the plans submitted during permit variation application.

ACTION: Update the EMS to ensure all control measures are contained within it for the extended area. Including drainage plans and methods for removal, pollution prevention methods and site maps.

Until such time as the EMS is updated to include the control measures and received by NRW no waste processing should take place in the new area.

Storage of Oils/Fuels:

A large amount of oils/fuels stored in drums and IBCs near the interceptor following an issue with the machine. This was to be removed shortly.

Oils and fuels should be stored in line with the Control of Pollution (Oil Storage) (Wales) Regulations 2016. Storage of oils should have a secondary containment. The photograph below shows the oil and fuel storage close to the interceptor. There was secondary containment on the IBCs. And as confirmed, the IBCs are stored in an area over 10m away from a waterbody, with concrete bund to the dockside. The small containers of oil/fuel were not stored on secondary containment, although this would be best practice, you have suitable response options in place to ensure the containment of these should an incident occur.

Please ensure oils and fuels continue to be stored appropriately.



Impermeable pavement on dockside of drainage channel

During the inspection it was noted that the concrete on the dockside of the drainage channel was very broken up, it is however separated from the waste treatment and storage area by a drainage channel. Craig explained that there are plans to re-concrete this section. No waste is currently stored on this section of the pavement. Until such time as the impermeable pavement is restored please ensure that the drains remain free flowing and clear of debris to allow the water from the

waste storage and treatment area to flow freely into the drains and do not escape onto the broken pavement. At the time of the inspection the drains were free flowing and clear of debris.



Storage of metal wastes:

Metal wastes appeared, although not measured, to be stored higher than the 6m stated in the EMS.

ACTION: Ensure wastes are store no higher than 6m.

Other Observations:

Thank you for forwarding the submissions of the waste returns for 2018 and 2019.

Orphaned gas canisters, which are occasionally imported in loads without being identified at the drop off time, were stored in a quarantine container awaiting removal from site.

Please let Sally Wakeford know when treatment operations are due to move from the current position to the new area of the site. NRW are aware that at the time of the inspection planning permission had not been finalised.

Thank you for taking the time to accompany officers around the site.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

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

You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales

EPR Compliance Assessment Report

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Site	Celsa Swansea Scrap Yard	Permit Ref	AB3891FT
Operator/Permit holder	Celsa Manufacturing (UK) Ltd	Date	05/02/2020

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.