

Compliance Assessment Report CAR_NRW0037014

Permit being assessed: UP3998FB.

For: Celtic Recycling Ltd, held by Celtic Recycling Ltd

At: Pyle, Bridgend, Glamorgan, CF33 6BZ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 02/10/2020 between 11:10 and 12:20.

Parts of permit assessed: B1, B3, C1, C2, C4, D1, D2, G4

NRW Lead Officer: Elysia Lovelock, accompanied by Craig Coleman.

Report sent to: Danny Reynolds, Depot Manager on 08/10/2020.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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.

At this time, we do not intend to take any further action.

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

Waste Regulation Officer Elysia Lovelock and Hazardous Waste Officer Craig Coleman were met on site by Danny Reynolds, Depot Manager and Alun Williams, Hazardous Waste Supervisor, at the regulated facility of Celtic Recycling, Unit 37, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BZ at 11.10am on Friday 2nd October 2020, who accompanied Officers around site explaining the sites operations. Weather during the visit remained unsettled with intermittent showers.

The purpose of the visit by Natural Resources Wales Officers was to conduct a routine site inspection to assess the sites compliance with the conditions of the tier 3 bespoke environmental permit UP3998FB and assess compliance with the hazardous waste regulations as a hazardous and non-hazardous mixed metal waste treatment facility.

Below provides a breakdown of the areas of the environmental permit that were assessed during the visit, followed by the Hazardous Waste aspects that were assessed:

B1 – Infrastructure – Engineering for prevention and control of emissions

Officers observed that the yards impermeable surface appeared to be in good condition, with secondary bunding containment in place for the storage of potentially contaminated metals, as shown below.



All processing of hazardous waste is undertaken within the permitted building on site. Officers observed that extraction systems were in place to ensure hazardous fumes are controlled and

hazardous liquids for processing metals were appropriately contained in a raised designated/bunded area to maintain a safe working environment, as seen below.



B3 – Infrastructure – Site drainage engineering (clean and foul)

There no were apparent issues with drainage/infrastructure on site at the time of the inspection. The sites interceptor is emptied and cleaned routinely every 2 years. Officers observed the sites drainage, which given the recent heavy rainfall, appeared to be free flowing, clear of any debris and in good working condition.



C1 - General Management - Staff competency/training

Upon request, Officers were provided with TCM Alun Williams WAMITAB Continuing Competence Certificate for our records, which was attained on the 10/03/2020 and expires on 10/03/2022, along with previous certificates dating back to 29th October 2009. The TCM Alun Williams, who is also the hazardous waste supervisor, is routinely in attendance at the site, 5 days a week.

C2 – General Management – Management system and operating procedures

It was discussed on site that officer Elysia Lovelock would request a copy of the Environmental Management System/Working Plan and the Fire Prevention and Mitigation Plan via email following the visit. This request was sent via email to Depot Manager Danny Reynolds on Monday 5th October 2020 and Natural Resources Wales are awaiting to receive the requested documents.

ACTION REQUIRED: Please provide a copy of the Environmental Management System/Working Plan and the Fire Prevention and Mitigation Plan via email. Please also ensure that copies are available on site for all staff and visitors upon request and in the case of an emergency.

C4 – General Management – Storage, handling labelling, labelling and Segregation

Officers observed all waste to be appropriately stored, segregated, contained and that all hazardous substances were appropriately labelled and stored. Despite the currently high demand for metal recycling, volumes observed on site appear to be well-managed.

D1 – Incident Management – Site security

Access to the site is restricted using electronic fobs and there is CCTV in operation which is monitored to ensure security of the site. The sites boundary is enclosed with security fencing. Officers noted that there is a section of the security boundary fence within the yard which is damaged as shown below. The Operator advised the damaged was sustained during the operation of the crane and advised officers that a repair is due and will be done in due course.



ACTION REQUIRED: Please ensure that the boundary fencing is repaired to maintain site security. I refer to the site plan below, to illustrate the location of the damaged fencing (outlined in red) requiring repair.

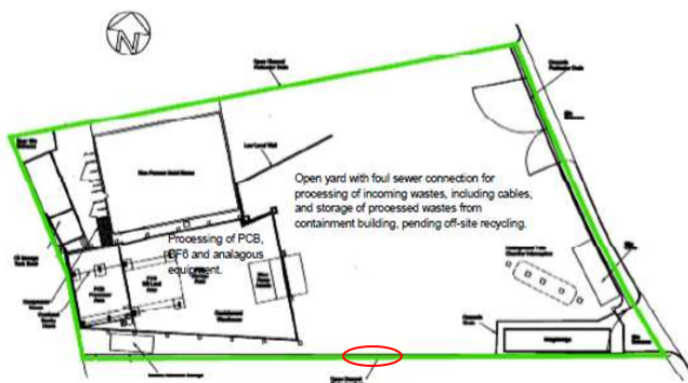


Figure 2. Site Plan

D2 – Incident Management – accidents, emergency and incident planning

Upon the request of documentation, Officers were provided with the sites Emergency Accident Management Plan, Doc Ref: SHE-EMP-PYLE-EAMP-v6, which is due for review on the 15th October 2020. Officers observed that spill kits, fire extinguishers and eyewash facilities were present for use in the event of an accident and/or emergency.

G4 – Monitoring and Records, Maintenance and Reporting – Monitoring of emissions and environment

In preparation for the site visit, the waste returns for 2020 including quarters 1 – 3 were reviewed and no issues pertaining to the use of EWCs/tonnages were identified. However, please ensure that the TCMs details are entered on every waste return submitted to Natural Resources Wales. In

addition, Hazardous Waste Officer Craig Coleman reviewed waste transfer notes whilst on site.

Additional comments

All areas of the site were inspected, and no breaches were observed on site. During the visit, officers observed waste being manually sorted in the open yard and the extraction of metals and division for recycling being undertaken within the building. Permitted treatments which are currently not in operation on site include: de-gassing, shredding, cryogenic freezing and granulating of cables.

Whilst on site, a discussion concerning an incident report received by Natural Resources Wales was addressed with Danny Reynolds and Alun Williams. They advised the reported activity is not undertaken within the yard/or on site. During our visit Officers observed only metal sorting activities taking place within the open yard and officers were advised that only low risk cable processing takes place within the open yard and that no burning of any waste takes place either in the open, inside buildings or in any form of incinerator, in accordance with the sites environmental permit. The sites hours of operation were confirmed as follows: Monday to Thursday, 7.30am to 4.30pm, Friday, 7.30am to 3.30pm, with essential maintenance occurring at weekends.

Hazardous Waste Inspection:

Celtic Recycling (Hazardous Waste Registration Number: CA1985) primary hazardous waste operation at the Bridgend site is the collection of damaged, outdated, disused, or unrequired industrial electrical equipment from electronic infrastructure such as transformers from power substations or electrical transition towers that are or may be contaminated with Polychlorinated biphenyl (PCB's). The equipment is brought on to site and treated to reduce the volume of PCB's to < 500 parts per million (0.05%). Once the equipment has been cleaned, the PCB's are consigned as 13 03 01* and sent onwards for destruction. This process is undertaken in a bunded area within an indoor facility which has good levels of lighting and ventilation. Addition extraction facilities are available as the site deals with other waste that need to be handled under extraction to eliminate any potential respiratory risks. As mentioned previously the working area for the PCB decontamination is undertaken in a bunded area that is constructed of hard-wearing masonry and is constructed to a reasonable height, so that no contaminated fluid would be able to escape in the event of a catastrophic failure. The working area has quick access to spill kits, fire suppression equipment and decontamination equipment in the event of an accident. All signage within the facility was clear, well positioned and in good order.

The site accepts waste in the form of pressurised gas containers. These are stored securely in cages prior to their transport on to another facility to be processed. As well as gases the site accepts waste oils. Again, these are maintained in a secure area and are sent onwards to another Celtic Recycling facility to undertake recycling. All potentially contaminated waste is segregated and disposed of correctly in line with hazardous waste regulations. Any asbestos that may end up on site is segregated and consigned to an authorised waste carrier to be disposed of. All municipal waste is handled separately from other waste streams generated on site.

Alun Williams is the sites Hazardous Waste Supervisor and the technically competent manager (TCM). His WAMITAB certification is up to date and expires in March 2022. The site has excellent training documentation in place that is frequently reviewed and updated. Consignment notes were

readily available on site, the consignment notes checked were completed correctly, with the relevant EWC codes, R&D codes and other necessary information completed.

Officers Elysia Lovelock and Craig Coleman wish to thank you for accompanying us during our visit and explaining the operations on site.

If you have any queries regarding this report, please do hesitate to contact me.

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 2012.

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 only relating to the activity assessment
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.

What are suspended scores?

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 Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.