

Compliance Assessment Report CAR_NRW0037508

Permit being assessed: ZB3593HH.

For: S L Recycling Ltd, held by S L Recycling Limited

At: Unit 9, Penallta Industrial Estate, Penallta, Hengoed, Caerphilly, CF82 7SU.

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

On 04/02/2021 between 10:40 and 11:15.

Parts of permit assessed: A / B / C / D / F / G

NRW Lead Officer: Greg Gardner, accompanied by Alex Bowder.

Report sent to: Rebecca Tucker, Technically Competent Manager on 25/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
C3 - General Management - Materials acceptance	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B2 - Infrastructure - Closure and decommissioning	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	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)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
and Reporting - Monitoring of emissions and environment		
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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?

Criteria	Action needed	Complete by
B3	Repair damaged areas of flooring on site to prevent potential contamination to ground water	01/03/2021
C3	Separate scrap electrical goods from standard scrap metal in order to prevent mixing waste streams and potential fire risk	01/03/2021

Action criteria codes are listed in the 'Important information' section below.

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

This report details the site visit made on the 4th February 2021 to SL Recycling Ltd, Permit number EPR-ZB3593HH

Officers Alex BOWDER and Greg GARDNER attended the SL Recycling Ltd Site at Unit 9, Penallta Industrial Est, Hengoed, CF82 7SU, for a routine site inspection at 10:40am where we met with Ms. Rebecca TUCKER (Technically Competent Manager). The weather was wet and cold all through the site visit.

To remind the company 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

PERMIT HISTORY

See below extract from permit regarding variation history.

Status log of the permit		
Description	Date	Comments
Permit determined EPR/ZB3593HH/A001	12/03/15	Original permit for authorised vehicle depollution and mixed metal recycling facility, issued to S L Recycling Limited.
Application EPR/ZB3593HH/V002	Duly made 20/11/17	Variation consisting of: • operator initiated variation to increase annual throughput to 17,000 tonnes per annum • regulator initiated variation to add in conditions relating to fire risk mitigation. Regulator initiated variation to add in conditions relating to fire risk mitigation.
Additional information	18/01/18	Request from the operator to increase the annual throughput further to 25,000 tonnes per annum
Variation determined EPR/ZB3593HH	25/01/18	Varied permit issued.

GENERAL OBSERVATIONS

SL Recycling Ltd, Penallta operate under a bespoke environmental permit. This site is used as a metal recycling facility along with ELV (End-of-Life Vehicle) treatment facilities with the waste being distributed to other companies / sites within the UK. The site was in operation at the time of the visit and there was no waste of any type was stored outside of the permit boundary at the time of the visit.

SITE INFRASTRUCTURE

The site was in good condition with housekeeping kept to a high standard with no loose debris located on the floor. Various metal waste components were stored in segregated zones with concrete 'lego' block areas (as seen in photo 1).



Photo 1 - Segregated zones of wastes

The site has an operational interceptor drainage system which was maintained and in good working order with no concerns at the time of the site inspection. It was noted that although the concrete impermeable flooring was in good condition, there were some areas where they were damaged and needed repairing (as seen in photo 2). An action plan is in place to repair and maintain the damaged flooring areas in question in soon.



Photo 2 - Damaged flooring next to scrap metal waste stockpile



Photo 3 - Damaged flooring located on site

ACTION: Repair damaged areas of flooring on site to prevent potential contamination to ground water

WASTE ACTIVITIES - METAL RECYCLING

During the visit there was a large stockpile of mixed metal waste located in the centre of the compound (as seen in photo 2). This metal waste consisted of various ferrous and non-ferrous scrap material as well as some electrical goods such as washing machines (as seen in foreground of photo 3). Discussion took place between NRW Officers and SL Recycling employees regarding the acceptance and treatment of the electrical goods. Going forward, SL Recycling would have to either apply for a new permit or vary their current permit to accept WEEE (Waste Electrical and Electronic Equipment) and encompass their ATF (Authorised Treatment Facility) capabilities or apply for a T11 waste exemption (repairing or refurbishing waste electrical and electronic equipment). The varying of the permit can be expensive due to it being bespoke.

It was noted by NRW officers that the height of the scrap metal pile was estimated to be slightly above 4 metres. Whilst we appreciate the high turnover at the site you will still need to adhere to this height restriction.



Photo 2 - Stockpile of mixed metal waste located in centre of compound.



Photo 3 - Closer image of mixed metal waste stockpile

ADVICE AND GUIDANCE ON WEEE

The T11 exemption allows you to repair, refurbish or dismantle various types of WEEE so

that the whole WEEE item or any parts can be reused for their original purpose or recovered.

The types of activity you can carry out under a T11 waste exemption include:

- a business collecting waste computers from householders and businesses that no longer want them
- a reclamation group receiving waste electrical goods collected by the local authority from businesses and households

Both sort out the waste equipment into those that can be repaired and those that cannot. Once sorted they repair some items and dismantle the rest to be reused as parts. You can store or treat up to 1,000 tonnes over any 12-month period.

Types of activity you cannot carry out include:

- de-gas ozone depleting substances
- treat WEEE to be disposed of to landfill or incinerated
- mix hazardous waste with other hazardous or non-hazardous waste
- accept or treat fluorescent light bulbs or tubes

Further information on the T11 waste exemption can be found on the below link to the external Natural Resources Wales website:

<https://naturalresources.wales/permits-and-permissions/waste-permitting/register-a-waste-electrical-and-electronic-equipment-exemption-weee/?lang=en>

If a variance of the permit is required then a Standard rules SR2008 No23 – waste electrical and electronic equipment authorised treatment facility (ATF) excluding ozone depleting substances would be required

These rules will allow the operator to operate a Waste Electrical and Electronic Equipment (WEEE) authorised treatment facility at a specified location. The total quantity of waste that can be accepted at a site under these rules must be less than 75,000 tonnes a year. The rules will not permit the treatment of WEEE containing ozone-depleting substances but it can be accepted for storage only.

WEEE treatment must be carried out inside a building. Treatment includes, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, or cutting of waste into different components for recovery

ACTION: Separate scrap electrical goods from standard scrap metal in order to prevent mixing waste streams and potential fire risk

WASTE ACTIVITIES - ELV

During the site visit NRW officers inspected the ELV section of the site. A depolluting bay is used to removed hazardous fluids from the vehicles which are then stored in large containers (see photos 4 and 5) with the spill kits placed near by in the event of a loss of containment. The waste tyres are stored safely next to the bay and are disposed of to Welsh Tyre Recycling in Hirwaun approximately once a quarter. The scrap cars were

stored safely and securely on site (3 cars high with no potential of toppling). The depollution bay was in good condition with no issues identified at the time of site inspection

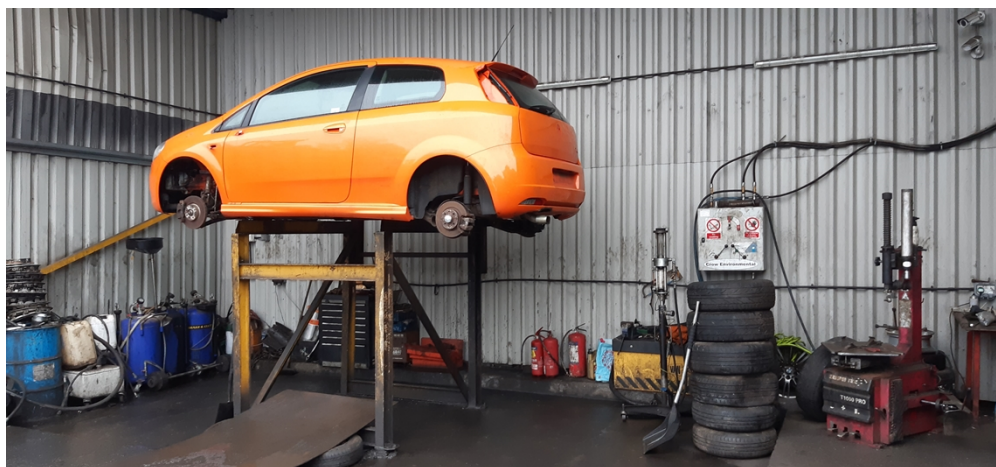


Photo 4 - Depolluting bay at SL Recycling, Penallta



Photo 5 - Storage containers where waste fluids from cars are stored

WASTE RETURN SUBMISSIONS

The site submitted its 2020 annual waste return data on 31st December 2020 declaring that 9,129.32 tonnes were accepted, and 13,615 tonnes were removed. All the mandatory sections within section 2 have been completed in full. Further details of the waste return data can be found on a separate CAR form for this site (Report ID - CAR_NRW0037465).

If you have any issues with this report please contact Greg Gardner on greg.gardner@cyfoethnaturiolcymru.gov.uk and / or Alex Bowder Alex.Bowder@cyfoethnaturiolcymru.gov.uk

I look forward to working with the site in 2021.

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

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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.