

Compliance Assessment Report CAR_NRW0037805

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: Incident Response (Incident number 2100089).

On 04/03/2021 between 11:00 and 13:00.

Parts of permit assessed: A1

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

Report sent to: Danny Reynolds, Depot Manager on 24/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	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

An unannounced site inspection was undertaken on Thursday 4th March 2021 at 11am by Industry and Waste Regulation Officer Elysia Lovelock and Hazardous Waste Officer Craig Coleman. The weather remained dry but unsettled during the visit.

The purpose of the visit was to investigate reports concerning alleged unauthorised activity.

Following inspection of various units held by Celtic Recycling on Village Farm Industrial Estate, officers concluded that advice and guidance would be issued regarding operations on this occasion. The operator requires a hazardous waste producer registration and a storage exemption registration for unit 107. Please see below for further details. No permit non-compliance issues were identified at the time of the visit to the regulated facility of Celtic Recycling, Unit 37, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BZ.

Ahead of the visit, it was established that Celtic Recycling operate from various units on Village Farm Industrial Estate including the following: Units 17, 18, 37, 57 and 107. This information is readily available via the Operators website. During the visit, the purpose of each of unit was established with the Operator.

Unit 57

We initially attended unit 57. On arrival we were greeted by a member of staff, we showed our warrant cards as identification upon entering the premises and explained the purpose of the visit. We were asked to sign in, read and signed the relevant health and safety paperwork. Our temperatures were taken and recorded whilst on site in accordance with COVID-19 guidance. The member of staff showed officers around the unit and yard and explained the operations on site. It was established this was a storage yard for equipment. Whilst on site Officers did not observe any unauthorised activity at this unit.

Unit 107

Officers then proceeded to unit 107 where we were greeted by a member of staff, again asked to sign in, read and sign the relevant health and safety paperwork. As before, our temperatures were taken and recorded whilst on site in accordance with COVID-19 guidance. Following this, officers proceeded to inspect the yard. It was established this was the fleet yard. Officers observed that waste was being stored at this location in open-top containers before being processed at the regulated facility, as pictured in the photograph below. We were advised this was due to disruption to operations/activities due to COVID-19.



Upon inspection of the yard officers observed sleepers that appeared to be saturated in an oil substance. It was established that the sleepers are used during operations however, please be aware that if these sleepers are no longer in use and are now classed as waste, they are contaminated and as such will need to be stored correctly before being disposed of as hazardous waste at an appropriately permitted facility. The same would also apply for oil-

soaked plywood boards and expired drums, as pictured in the photographs below.



As pictured in the photographs above, Unit 107 has a hard standing with no perimeter bunding, suitable for the purpose of the yard being to store the fleet of vehicles, however as such, it does not provide any containment. Therefore, please ensure waste is stored appropriately with the correct authorisations in place.

S2 Exemption

Having read the guidance, Officer Craig Coleman believes that 107, Village Farm Road, Pyle, Bridgend CF33 6BL would benefit from an [S2 Waste Exemption](#). The weights and storage times are listed on linked Exemption guidance page.

Officer Craig Coleman has checked them against your waste returns for the past three quarters and it is important that you do not store any waste that is not listed on the Exemption at the site, as that will automatically invalidate it and classify the site as an illegal waste site.

There is no provision within the S2 Exemption for any material containing asbestos material. There are strict provisions within the Exemption, and storage there is only for waste that is pending its recovery elsewhere and Exemptions are intended to be low risk.

Upon closer inspection of the amount of waste being stored here as pictured in the photograph below, please ensure that if you wish to store in line with the S2 exemption that the restrictions on the amounts and types of waste are adhered to. It is the operator's responsibility to ensure that the correct authorisations are in place.



Whilst on site, Officer Craig Coleman identified an open-top hazardous waste container that had held hazardous waste that had not been decontaminated/pumped and rainwater had accumulated within the container, as pictured in the photograph below. Members of staff ran through the procedures pertaining to the abstraction of contaminated/hazardous liquids. During this conversation, officers were met on site by the Depot Manager.

Hazardous Waste Officer Craig Coleman provided advice and guidance on site and explained the requirements for the correct handling of this waste and advised that a Hazardous Waste Producer Registration would be required for the yard.



Hazardous waste guidance

In relation to Unit 107, Village Farm Road, Pyle, Bridgend CF33 6BL

Production of hazardous waste. If you produce >500kg of hazardous waste at a site, you must [register](#) as a hazardous waste producer in Wales. It is an offence to fail to register as a producer in accordance with regulation 21 of The Hazardous Waste Regulations (Wales) 2005.

When you notify us of your premises, we place your details on a register and you will be given a hazardous waste producer registration number called a 'premises code'.

When waste is collected from premises and taken to another location a consignment note is required regardless of whether you are a registered premises or exempt.

You can read about your responsibilities as a hazardous waste producer on Gov.uk.

Unit 37

Officers then proceeded to the regulated facility of unit 37 to determine compliance with the permit EPR/UP3998FB. Upon arrival, officers attended unit 17 and 18 to discuss the visit. These units are used for office space. Sign in procedures and health and safety including COVID-19 procedures were adhered to, as had previously occurred at the other units.

During the inspection of the site, officers enquired as the removal procedures of contaminated liquid from the bunded containers, as pictured in the photograph below.



Officers were advised this occurs as frequently as is required, as this can fluctuate dependent on rainfall. Officers later inspected hazardous waste transfer notes pertaining to the removal of this hazardous waste. The operator also advised that the sealed drainage for all external areas of the site used to store and/or treat waste comprises of a lawful discharge to foul sewer under a trade effluent consent from Dwr Cymru Welsh Water.

During the visit, officers observed hot cutting treatment of waste which results in size reduction of permitted waste as per the permit, as pictured in the photograph below.



Officers observed that the waste in the mixed waste bin did not contain any materials that should be handled separately, as pictured in the photographs below.



At the time of the visit, officers did not see a lockable asbestos bin at the facility, however as the permit allows for the storage of asbestos, please ensure any asbestos waste is double bagged and stored within clearly identified, segregated, secure, lockable containers on an impermeable surface with sealed drainage system.

Officers queried the removal of contaminated china. The operator explained that all contaminated china is decontaminated in the shed/bunded area before disposal. Officers were unable to inspect the china bin as access was impeded due to the ladder being broken.



Upon inspection of the unit, the operator advised that the entire shed is bunded. This ensures adherence to the permit condition which requires that there shall be no discharge from the buildings on site used to store and/or treat waste. PCBs are stored in drums here on wooden pallets. On transportation of the used PCB's, please ensure there is secondary containment in place. Officers were advised the drums have expiry dates which can be seen as they are clearly labelled.



Officers concluded the visit at approximately 1pm. We wish to thank you for your time and the staff we spoke with throughout during the visit to discuss operations on site and requirements as per the regulations.

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.