

Compliance Assessment Report CAR_NRW0037807

Permit being assessed: DB3097TJ.

For: G L J Recycling Limited, held by G L J Recycling Limited

At: Chapel Bridge Yard, Lower Chapel Bridge Industrial Estate, Cwmcarn, Newport, NP11 7NL.

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

On 11/03/2021 between 13:30 and 15:10.

Parts of permit assessed: Various

NRW Lead Officer: Jonathan Lee, accompanied by Alex Bowder, Wayne Grimstead.

Report sent to: Gareth Jones, Colin Manning, Mark Tuckey, Director, TCM, Environmental Consultant 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)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	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	Action only (X)	
E1 - Emissions - Air	Assessed (A)	
F2 - Amenity - Noise	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
D2	Ensure compliance of site activity and stockpile sizes in	25/03/2021

Criteria	Action needed	Complete by
	relation to requirements of FPMP guidance.	

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

Compliance Assessment Report – EPR/DB3097TJ

This report considers an inspection of the environmental permit **EPR-DB3097TJ** held by GLJ Recycling Limited completed by Officer Jonathan Lee, Senior Officer Alex Bowder and Industry Regulation Officer Wayne Grimstead. Weather was cool, breezy with some showers. Ground wet due to heavy rainfall during previous days. Officers met with Director Gareth Jones and Environmental Consultant Mark Tuckey on site.

The permit comprises the following standard rulesets: -

- SR2008 No20 – Vehicle storage, depollution & dismantling (authorised treatment) facility
- SR2008 No21 – Metal recycling site

The inspection was arranged for several reasons;

- To complete a routine inspection of site activities and site infrastructure.
- To complete an assessment of noise from site activity, partially in response to several incidents concerning noise from the site prior to the inspection.
- To complete an assessment of any visible emissions emanating from the new shredder on site.

This report considers observations made during the site inspection and notes of officers made in industrial and residential areas surrounding the site following the site inspection.

Photographs were taken during the inspection and those referenced are included in a section at the bottom of this report.

Inspection Observations

The site was fully operational during the inspection. Officers witnessed routine operation of the following activities during the site visit: -

- Operation of the metal shredder, including loading of input scrap metal into the hopper/shredder, downstream processing, unloading of processed fractions from conveyor belts.
- Operation of the baler and shear.
- Unloading of incoming waste material from large 'Ro-Ro' skips and smaller commercial

- vehicles laden with both scrap metal and general waste.
- Loading of containers with processed waste fractions.
- Movement of metal/End of Life Vehicles (ELVs) between stockpiles using grab machinery.
- Movement of metal and ELVs between stockpiles/bunkers using bucket loader/forklift.

Officers walked around the site and inspected the operation of machinery as described above and stockpiles of the various waste streams stored across the yard. It was noted that the main stockpile of input metal to the shredder was in exceedance of the 4-metre height Fire Prevention & Mitigation Plan (FPMP) restriction specified in the guidance (as shown in Photo 1). The operator confirmed that this was a temporary exceedance and that the stockpile regularly fluctuates dependent on quantity of waste accepted to the site.

Please note that, whilst NRW appreciate the high turnover rate for storing and treating this stockpile, the operator must attempt to adhere to this height restriction at all times to comply with the permit conditions, reduce the risk of fire and allow for safe fire-fighting in the event of an incident.

No issues noted in relation to the other stockpiles of processed waste and containment infrastructure at the time of inspection. No issues noted in relation to site drainage infrastructure. No issues were noted in relation to the ELV activities and infrastructure on site.

Metal Shredder Facility Emissions

Prior to the inspection, NRW received incident reports detailing a grey or blue emission seen to be emanating from the new metal shredder at the site.

Officers walked the perimeter of the new metal shredder and to the top of the facility. Mark Tuckey explained to Officers how the shredder utilises a water injection system as part of its operation, with the water being rapidly heated by the hot surface of the waste metal/shredder components. The water is designed to capture any residual dust that exits the machine from the shredding action and adds this to the waste stream. Steam is produced as secondary by-product of the process, which dissipates as vapour beyond a certain distance of expulsion.

Officers noted a white colour emission from the top of the shredder housing and during the entirety of the site inspection (as shown in Photos 2 and 3). This could also occasionally be seen on the conveyor belts of the material exiting the shredder. A white colour emission is consistent with that of steam (water vapour) and dissipated within several metres of leaving the facility. This by-product does not pose any direct environmental harm to the surrounding receptors. Officers did not witness a blue or grey smoke emission during the inspection. Officers did not note any strong or offensive odours during the inspection.

The water vapour emission could be seen from the nearby Chapel Farm Industrial Estate at 15:20 (as shown in Photo 4). Officers agreed that, at that time, this did not constitute smoke.

The operator stated that it intends to immediately address any instances of blue/grey smoke if this occurs. The operator also stated that the feedstock is checked every day and by a series of machinery operators before being loaded into the shredder facility to ensure any contaminated material is not put through the treatment process.

The main motor housing was inspected; this area is fully enclosed and concreted to assist with containing measures. Officers noted that green colour acoustic panelling is in place surrounding the new metal shredder which helps contain any noise impacts. Officers inspected the waste feedstock used for the shredder input; this was compliant and did not contain any contaminated waste materials.

Industrial Emissions Directive (IED)

It was noted and discussed with the operator that an application for an Industrial Emissions Directive (IED) permit is currently being determined by NRW. Officers stated that pending the outcome of this permit application, the site is limited to shredding a maximum of 75 tonnes of non-hazardous waste per day as per condition 2.1.1 referring to Table 2.1 of the permit.

Noise

Whilst within the permitted boundary, the continuing noises of note were that of processed material falling off conveyor belts, separation of waste fractions in the downstream processing plant particularly where fractions were being separated using the rotary magnetic drum. The 'intermittent' noises of note were the occasional unloading of scrap metal, movement of scrap metal, input of scrap metal to the hopper of the shredder and the loading of processed fractions into containers prior to removal from site. The operation of the new metal shredder was not noted as a loudest element of the site and its activities.

At 15:20 following the inspection of the site, officers proceeded to Chapel Farm Industrial Estate to assess noise and amenity impacts from outside of the permitted boundary. The Industrial Estate is one of the closest areas outside of the permitted boundary, with the River Ebbw intersecting the site boundary and the Industrial Estate. Officers noted that the site activity could be faintly heard when positioned directly opposite the centre of the site, particularly the constant 'ting' of processed material falling off the conveyor belt downstream of the processing plant.

At 15:40, officers proceeded to Chapel Farm Terrace (residential street to the North of the site boundary), walked towards Newport Road, Cwmcarn and remained in the area for around 15 minutes. Officers could not hear any excessive site activity to be emanating from Chapel Farm Terrace over the road noise of the A467. Officers walked along an access lane to the rear of Newport Road, Cwmcarn stopping at several points to assess noise. It was difficult to hear GLJ Recycling Ltd site activities over the noise of the A467.

Reported Incidents – Other

NRW have received reports of burning of waste coming from the vicinity of the site, which was alleged to be the GLJ Recycling Limited operation. The operator confirmed that this was unrelated to their activity and was illegal disposal of waste occurring at the Chapel Farm Industrial estate. This matter has been investigated separately.

Permit Compliance

E1 – Emissions to air – Compliant

Permit condition 3.1.1. states that emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

Permit condition 3.1.2 states that the operator shall:

- a. if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan;
- b. implement the approved emissions management plan, from the date of approval, unless

otherwise agreed in writing by Natural Resources Wales.

NRW officers will continue to monitor this permit condition and respond to further incident reports of a blue or grey smoke emanating from the site. If NRW officers substantiate that the site activities or the shredder are giving rise to a visible pollution that is not a white colour consistent with a steam emission, then further compliance action may be taken in accordance with permit condition 3.1.2 (a).

Please notify NRW of any malfunction or breakdown of the shredder/any other site machinery as per permit condition 4.3.1 (a) (b) & (c).

F2 – Noise – Permit Condition 3.3.1 – Compliant

Permit condition 3.3.1 states that Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration.

Officers did not perceive there to be a noise pollution outside of the permitted boundary during the visits to areas surrounding the site following the inspection. NRW officers will continue to monitor this and respond to further incident reports if received. If NRW officers substantiate that the site activities or the new shredder are giving rise to a noise pollution, then further compliance action may be taken in accordance with permit condition 3.3.1.

D2 – Incident Management – Permit Condition 3.4.1 – Action only

Permit condition 3.4.1 states that the operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.

It was noted that the operator had made significant improvement in relation to fire-risk and prevention since the previous inspection. Indeed, several new 'bunkers' had been constructed and volumes of stockpiles to the rear of the site had been reduced since the previous inspection. However, officers noted that the stockpile of feed scrap material to the shredder was slightly in exceedance of the 4-metre limit stated with the FPMP guidance.

Action: Ensure compliance of site activity and stockpile sizes in relation to requirements of FPMP guidance.

Deadline is on receipt of this report.

Site Photographs



Photo One – Stockpile of input metal to shredder facility



Photo Two – View of shredder, steam emission



Photo Three – View of shredder, downstream plant and housing



Photo Four – View of top of shredder from Chapel Farm Industrial Estate

If you have any issues with this report, please contact Officer Jonathan LEE on 0300 065 3908 or via email at jonathan.lee@naturalresourceswales.gov.uk

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

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.