

Compliance Assessment Report CAR_NRW0037828

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: Incident Response (Incident number 2102617).

On 26/03/2021.

Parts of permit assessed: Emissions

NRW Lead Officer: Jonathan Lee.

Report sent to: Gareth Jones, Mark Tuckey, Director, Environmental Consultant on 31/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	C3 Minor	3.1.1

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

Total number of non-compliances recorded	Total non-compliance score
1	4

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
E1	Investigate potential source(s) of a blue colour emission from metal shredder activities and report findings to NRW. (Already completed, but to be monitored in case of further incidents). Complete a log of visible emissions from the metal shredder, including details of intensity/colour at regular intervals during the operational day. For the same periods complete a log of material being processed within shredder and the responsible Operator. Respond to any further incident reports of this nature as per notification procedure with NRW Incident Communication Centre.	30/04/2021

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

Compliance Assessment Report – EPR/DB3097TJ

This report considers the attendance of incident report of a blue/grey smoke in the area surrounding GLJ Recycling Limited, Lower Chapel Bridge Yard, Cwmcarn. Photographs referenced are given below.

During the week commencing 22nd March 2021 Natural Resources Wales were notified of several incident reports of a blue or grey smoke emanating from the site. These reports typically tend to be notified during the afternoon. These incidents were attended by officer Jonathan LEE on the afternoon of Friday 26th March 2021. Weather was cool, bright but with intermittent rain showers.

At 13:00pm the bridge to the end of Chapel Farm Terrace was visited. From this location the consistent steam emission of the shredder was visible. There were occasional instances of a blue colour emission noted, as shown in Photo 1 below.

At 13:10pm, the corner where Chapel Farm Terrace meets A467 was visited, the site and the shredder can be partially seen over the Chapel Farm Industrial Estate. At this location instances of a blue colour emission were noted, as shown in Photo 2 below.

At 13:25pm – 14:05pm the access lane to the rear of Newport Road, Cwmcarn was visited. The site and the top of the shredder acoustic panelling could be seen through gaps in the trees at this location. At this location instances of a blue colour emission were noted, as shown in Photos 3,4 and 5 below. It was noted that this blue colour emission was not constant and tended to come in bursts with the blue colour appearing to 'hang' in the air several metres above the top of the shredder housing.

Officer LEE did not note a grey colour emission during the times present in the locations listed above.

A white steam emission is noted as typical for this operation (as detailed in previous CAR form reference (CAR_NRW0037807), however as noted and shown in the photographs below there is also a blue colour emission emanating from the shredder. Natural Resources Wales (NRW) consider such an emission is not only a condensation plume but is likely to include other components, for example an oil mist.

Following the visit conducted to the area by officer LEE, the operator was contacted on Tuesday 30th March alerting them that an incident of blue smoke had been substantiated. NRW appreciate that you acted quickly in response to receiving this confirmation that officer LEE substantiated this incident, and immediately conducted a mechanical check of the shredder to establish the root cause of this incident. In response it was indicated that a faulty water pipe in the shredder was the likely cause, and that the maintenance intervals for this part of the shredder has been shortened to daily prior to the start up of the shredder.

E1 – Emissions to air – Permit Condition 3.1.1 - Category 3 Breach

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.

You have been scored a **Category 3 Breach** of permit condition 3.1.1.

Whilst NRW appreciate you acted quickly to resolve this issue when you received confirmation. However, a Category 3 breach has been scored as NRW must consider the environmental effect at the time the incident was substantiated on the 26th March 2021.

Action(s):

- Investigate potential source(s) of a blue colour emission from metal shredder activities and report findings to NRW. (Already completed, but to be monitored in case of further incidents).
- Complete a log of visible emissions from the metal shredder, including details of intensity/colour at regular intervals during the operational day.
- For the same periods complete a log of material being processed within shredder and the responsible Operator.
- Respond to any further incident reports of this nature as per notification procedure with NRW Incident Communication Centre.

A deadline of the 30th April 2020 has been given for these actions to be taken.

Photographs



Photo One – View from bridge at end of Chapel Farm Terrace



Photo Two – View from junction of A467 Newport Road



Photo 3 – View from lane to rear of Newport Road



Photo 4 – View from lane to rear of Newport Road



Photo 5 – View from lane to rear of Newport Road

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.