

Compliance Assessment Report CAR_NRW0038933

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, Cwmcam, Newport, NP11 7NL.

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

On 05/11/2021 between 13:30 and 14:40.

Parts of permit assessed: Various

NRW Lead Officer: Jonathan Lee.

Report sent to: Gareth Jones, Site Manager/Director on 15/11/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	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)	

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
A1	Prioritise processing of residual waste from previous shredder. Ensure no waste stored on site for longer than 3 years prior to recovery.	01/06/2022
B3	Complete repairs to areas of impermeable surface which are	31/01/2022

Criteria	Action needed	Complete by
	showing evidence of cracking/minor damage due to heavy operational activity.	

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. Weather was cool but dry. Officer Lee met with Director and site manager Mr Gareth Jones.

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 to complete a routine inspection of the permitted area, and following reports made regarding ongoing construction works to the Northern end of the GLJ Recycling Limited site. Given the overlap in regulatory remit a joint visit was arranged, the inspection was conducted in the company of planning enforcement officer Mr Jonathan Brooks from Caerphilly County Borough Council.

An inspection of the waste transfer station/WEEE permit, reference *EPR-LB3093HH* held by GLJ Recycling Limited was conducted at the same time. A separate compliance assessment report is to be issued for this inspection.

Inspection Observations

Site Activities and Infrastructure

The site was fully operational during the inspection with the metal shredder and shear processing incoming scrap metal/End of Life Vehicles (ELVs). Within the main stockpile of input material to the new shredder on site it was noted that within this stockpile there is some residual waste from the previous shredder situated on site.

It was noted that minor repairs to high-wear areas of impermeable surface are required. There was evidence of cracking particularly in the areas where large grab machinery is used for handling scrap metal to be input to the shredder on site. It is understood that routine repairs are due to be completed over the upcoming festive period to ensure the integrity of the impermeable surface and prevent any pollution to ground.

It was noted that the operator had recently commissioned construction works to the Northern end of

the site, in the area of and behind the 'old' waste transfer station building. In this area new concrete panels had been installed to form a boundary fence along the site boundary. It was noted that these works had been conducted to formalise the site boundary and that the previous fencing had fallen into disrepair. It was also noted improvement to the concrete surfacing in this area is to be conducted. No wastes were being stored and no waste processing activities were being conducted in this area at the time of the inspection.

No issues noted in relation to the ELV activities or depollution bay infrastructure.

Amenity Incidents

Natural Resources Wales (NRW) continue to receive and respond as appropriate to incident reports relating to amenity issues such as noise, out of hours operations, 'explosions' and emissions of smoke from the shredder on the site. There is a notification procedure in place with the NRW Incident Communication Centre and the operator. It is noted that you have been responding to all reported incidents, thank you for investigating and responding to incident reports promptly and appropriately.

Officers inspected the shredder from the top of the shredder housing during the inspection. Whilst on site no blue or grey smoke emissions were noted, a consistent white steam emission was observed from the top of the shredder housing. As per previous inspection, see *CAR_NRW0037828*, please continue to monitor visible emissions from the shredder on site and respond to any further incident reports of this nature.

The number of incident reports relating to noise have notably decreased in the months prior to the inspection however, there have been some incident reports relating to 'explosions'. It is understood that any 'explosions' on site have been due to accidental input and subsequent deflagration of concealed materials such as gas canisters into the metal shredder on site. Please ensure that waste acceptance and handling procedures are adhered to at all time to prevent/reduce incidents of this nature.

In addition, there have been occasional reports of out of hours working. Whilst these have not been directly substantiated by an NRW officer please ensure that hours of operations are adhered to as per site management documentation and conditions of the relevant planning permission.

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. 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.

Permit Compliance

A1 – Specified by permit – Action only - Permit Condition 2.1.1.

Permit condition 2.1.1, Table 2.1 Limits of Activities states that wastes shall be stored for no longer than 3 years prior to recovery.

During the inspection it was noted that residual waste from the previous metal shredder situated on the site is awaiting further processing. Consideration must be given to this 3-year time limit and the suitable processing of this waste must be completed as a priority given the length of time this waste has now been in-situ.

Action – Prioritise processing of residual waste from previous shredder. Ensure no waste stored on site for longer than 3 years prior to recovery.

A deadline of the **1st June 2022** has been set for this action to be completed. This is **estimated** as 3 years since this waste has been in situ, please advise and provide evidence to your regulatory officer if this incorrect.

B3 – Site drainage and engineering – Action only – Permit Condition 2.3.1

Permit condition 2.3.1, Table 2.3 requires all waste to be treated on an impermeable surface with sealed drainage system.

It was noted during the inspection that minor repairs to high-wear areas of impermeable surface are required. It is understood these repairs are due to be completed over the upcoming festive period.

Action – Complete repairs to areas of impermeable surface which are showing evidence of cracking/minor damage due to heavy operational activity.

A deadline of the **31st January 2022** has been set for this action to be completed. It is appreciated these works are subject to operational constraints.

Summary

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.