

Compliance Assessment Report

Report ID:
CAR_NRW0033052

This form will report compliance with your permit as determined by an NRW officer

Site	Newport Recycling Facility NRW/EPR/YP3135TE/V004	Permit Ref	YP3135TE			
Operator/Permit holder	Celtic Recycling Ltd					
Regime	Installations					
Date of assessment	13/03/2018	Time in	10:00	Out	12:00	
Assessment type	Report/Data Review					
Parts of the permit assessed	Waste returns, annual report					
Lead officer's name	Willey, David					
Accompanied by						
Recipient's name/position	Philip Morris/ Depot Manager	Date issued	26/03/2018			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Site visit - 13th March 2018

A site visit was arranged with Keith James (KJ), Managing Director, and Philip Morris (PM), Depot Manager, to discuss the annual returns as well as discussing the following:

- Permit requirements
- Actions from last CAR Form
- Annual returns
- Waste audit
- Transfrontier of Waste (TFS)
- Site inspection

Permit requirements

DW provided PM with a spreadsheet that details the requirements of the permit and the associated timescales. This was undertaken due to the change of Depot Manager from Iain Kier to PM. PM worked closely with Iain and is familiar with the permit requirements.

In addition to the monitoring requirements there are four yearly reviews required for energy efficiency, efficient use of raw materials, avoidance, recovery and disposal of wastes produced by the activities. Typically these are looked at annually by the site.

As part of the IED implementation condition 3.1.3 requires monitoring for groundwater every 5 years and soil for every 10 years. The IED permit was issued in 2013 with the groundwater monitoring due in 2018.

Page 66 of the document 'How to comply with your environmental permit' has some information on the requirements of the groundwater and soil monitoring.

<http://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>

The permit requires process monitoring of the bag filter that serves the metal shredder and monitors for pressure drop. KJ and PM confirmed that this process is automatic and is a self-contained unit. When there is a pressure drop the bag is automatically emptied and the pressure brought back up to the necessary pressure. There is no need for this to be reported to NRW. If the system has failed and there is the potential for a release of particulates then this should be reported to NRW using the Notification Form in Schedule 5 of the permit.

Actions from the last CAR Form

There were three actions carried forward from the CAR Form issued on the 8th June 2016.

1. ACTION: Celtic Recycling to amend their waste codes for paper and cardboard sent from the

site from 19 12 12 to 19 12 01 that is for paper and cardboard specifically. *Completed.*

2. ACTION: Could CRL confirm that there is a sign off procedure, or equivalent, in place following the draining process? For example is it visually checked by suitably trained staff? *Completed.*

CRL supplied copies of the procedures for treatment and sign off of the draining process. CRL provided several documents from the sites EMS with the document referenced: SHE-RAMS-NPT-DDT-v3, Dismantling and Draining of Transformers Unit 30 listing the procedures for checking and draining the transformers. Paragraph 4 of the document requires the transformers to be drained down whilst placed at an angle on a block for 3 days before the oil is sucked out.

3. ACTION: Please could you provide the waste transfer notes for the waste cardboard and paper in 2015 Q4. *Completed.*

Data for the destination of the waste paper and cardboard was requested to enable an audit of the waste being sent from the site to its next destination.

Annual returns

The following returns have been received by NRW:

Form Air1

Form Energy1

Form Performance1

Waste audit

An audit of the hazardous waste received to site was undertaken looking at traceability. One load in particular was identified to look at that was a 20 tonne load from Northamptonshire, waste code 160213. The site was not warned of the audit and the site were able to demonstrate waste accepted to site, where it is weighed with the associated consignment note. A hardcopy of the consignment note was provided reflecting the same weight and where the transformer originated.

On weighing the incoming transformer a Goods Received Note (GRN) is completed with the weight entered manually to the Waste Stats Database. The database is used to generate the waste returns that are submitted to NRW. For the load used in this audit the GRN was 5054 and was clearly reflected in the database, the consignment note and the waste return.

This procedure followed the sites Waste Acceptance Procedure Ref; SHE-PRO-NPT-WAP-v2.

Transfrontier Shipment of Waste (TFS)

An audit was undertaken on the TFS at the site. After discussions with colleagues in the TFS team they confirmed that TFS covers both hazardous and non-hazardous waste exports. KJ demonstrated the use of the Annex VII and supplied a copy of a completed form. The form had the Basel Annex IX code B1040 for *Scrap assemblies from electrical power generation not contaminated with lubricating oil, PCB or PCT to an extent to render them hazardous* and the associated waste code 160214 for waste from electrical and electronic equipment - discarded equipment other than those mentioned in 160209 to 160213.

The following link has information of both hazardous and non-hazardous waste under TFS:

<https://www.gov.uk/guidance/importing-and-exporting-waste>

SF6 separating plant

The SF6 separating plant at the site now has a passive leak detection system in place instead of the previous handheld device.

NRW queried what procedures were in place if there was a leak of SF6 discovered as a result of weighing in and out the gases. KJ informed NRW that there had not yet been a leak from the site and in Section 5 of the Emergency Accident Management Plan Ref: SHE-EMP-NPT-EAMP-v8 there are emergency procedures for what to do in the event of a release.

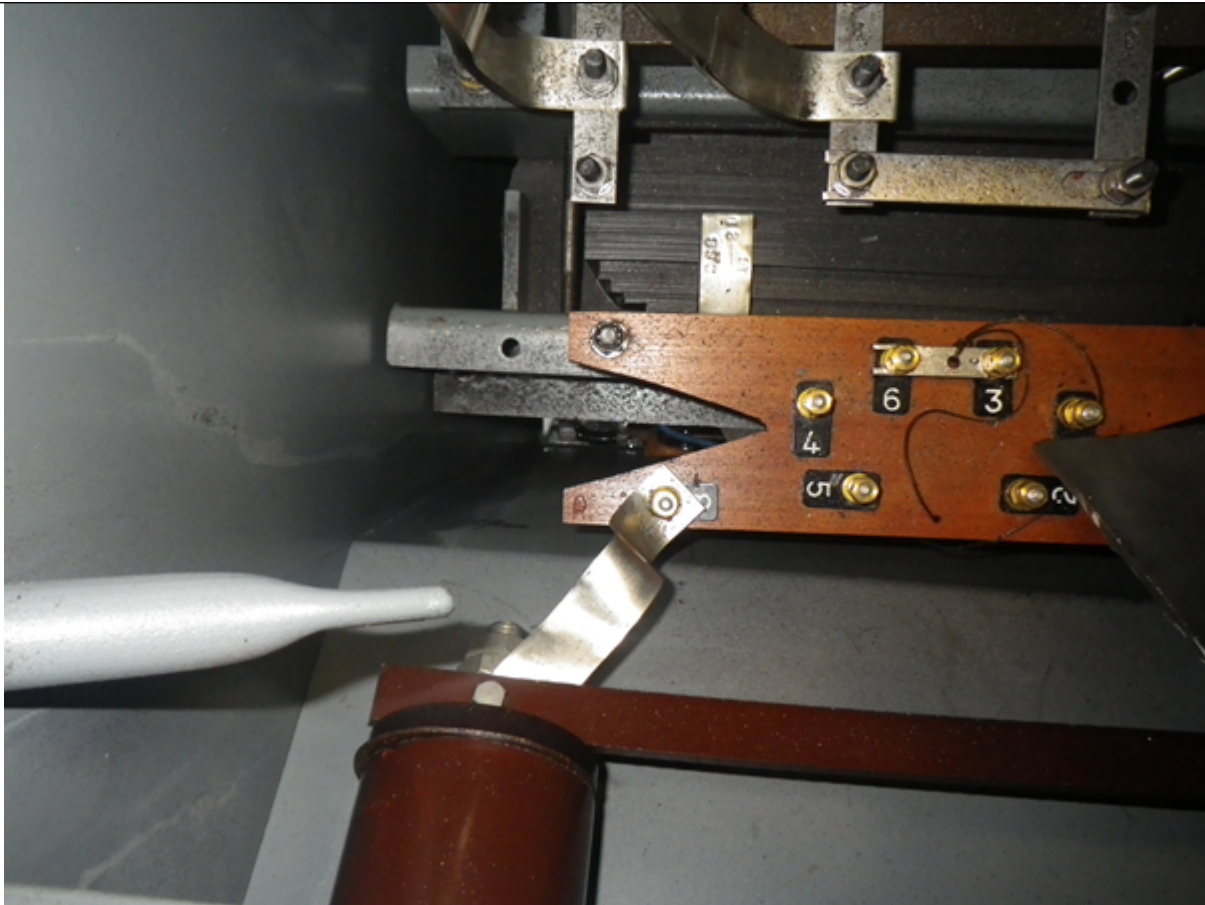
ACTION: CRL to add a requirement to notify NRW in the event of a release using the Notification Form in Schedule 5 of the permit.

The separating plant has also benefitted from the addition of a new SF6/N2 separating plant that enables the preparation of used SF6 gas containing high percentages of nitrogen to air to the desired quality so that the SF6 can be reused in gas compartments. The alternative to this is to send these out of spec gases for incineration. The separating plant does not require a permit variation as it is part of the existing SF6 process permitted in 2011.

ACTION: CRL to send the updated EMS once approved.

Site inspection

A brief site inspection was undertaken primarily to look at the drained transformers that are ready for exporting from the site. The procedures in the document Ref: SHE-RAMS-NPT-U31-v7, Dismantling Activity (unit 31) was being followed with the following photo taken from one of the transformers. DW witnessed the oil being sucked out from the transformer and then left again to drain.



ACTION: CRL to investigate whether there is a way to weigh the outgoing transformer using the name plate to demonstrate the effectiveness of draining the oil?

END

EPR Compliance Assessment Report

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Operator/Permit holder	Celtic Recycling Ltd	Date	13/03/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.