

Compliance Assessment Report CAR_NRW0039213

Permit being assessed: BB3737RS.

For: A J T Recycling Ltd, held by AJT Recycling Ltd

At: A J T Recycling Ltd, Felinfach, Fforestfach, Swansea, Swansea, SA5 4HF.

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

On 21/01/2022 between 13:30 and 14:15.

Parts of permit assessed: A, B, C, D, F

NRW Lead Officer: David Morgan, accompanied by Sally Wakeford.

Report sent to: Jonathan Davies, General Manager on 25/01/2022.

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)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
D1 - Incident Management - Site security	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F5 - Amenity - Deposits on road	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
C4	Take measures to clear up materials used in minor spills	28/01/2022

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

A routine site inspection was undertaken on Friday 21st January 2022. Present on site during the inspection were: David Morgan (Natural Resources Wales), Sally Wakeford (NRW), Jonathan Davies (AJT), Andrew Thomas (AJT) and Tony Davies (representing AJT).

A site inspection was undertaken to assess compliance with the Environmental Permit, following which, a discussion was held regarding the requirement previously raised to update the site's Environmental Management System (EMS).

During the site inspection, the following observations were made:

Waste Storage

At the time of the inspection there was a large volume of waste on site, the majority of which was stored in one central waste stack. It was noted that this waste was awaiting imminent removal from site. No formal measurements were taken in relation to the dimensions (specifically height) of the stack. However, please be mindful of storage practices and limits noted in the site's planning permission and Fire Prevention and Mitigation Plan.

Site Surface

A small area of the site surface appeared to be damaged. However, on closer inspection, it was clear that a small volume of aggregate had been placed on the site surface to prevent damage to the concrete pad when moving waste.

Generally, the site surface, and wider site infrastructure appeared to be in very good condition with no major cracks/damage that would allow ingress of site surface waters into the ground.

Waste fluids/liquids

In the area dedicated to storage of waste fluids/liquids, from the vehicle depollution process, there were a number older IBC's that appeared to be worn/lightly damaged. It was suggested that these may be removed from site.

In the area in which the oil storage tanks are placed, a new bund has been constructed to prevent escape of any waste fluids/liquids. It is likely, in a future inspection, that you will be asked to evidence that this meets standards for storage requirements (110% of total volume).

This area, in general, appeared to be very well maintained and there were no visible signs of leaks/spillages in this area.

Minor Spillage

On the far right side of the main yard (upon entering), where engines are stored, there were signs of a minor spillage/leak of oil. Granules/sawdust had already been laid to soak up this spill/leak. It is best practice to remove these materials as soon as is practically possible.

This is not recorded as a non-compliance of the Environmental Permit, but an action is placed on you to remove these granules and dispose of them as hazardous waste. It is likely, that in a future inspection, officers will request to see copies of the consignment notes that are a record of this waste being taken off site.

Plot 2

David Morgan and Jonathan Davies briefly discussed the exempt waste activity/construction of walls in Plot 2. It was agreed that as Plot 2 is not part of the permitted site, this matter would be dealt with separate to permitted activities.

Natural Resources Wales will contact you regarding this matter in the coming weeks.

Environmental Management System (EMS)

Following the last inspection to site on 19th November 2020, the EMS for the site was reviewed. A list of requirements for additions to the EMS were communicated to you in a Compliance Assessment Report (ref: CAR_NRW0037183).

On Friday 21st January 2022, an updated copy of the EMS was made available to officers on site. A brief review was undertaken on site and it was noted that many adjustments had been made to the EMS.

Please email copies of the updated EMS and Fire Prevention and Mitigation Plan (FPMP) at your nearest convenience.

Summary

At the time of the inspection, the site appeared to be managing waste storage practices very well. All wastes on site were compliant (in terms of acceptance on site) and were clearly segregated. One item of note was that there did not appear to be any Waste Electrical and Electronic Equipment (WEEE) in general scrap. This was something that has been highlighted in a previous inspection.

The site infrastructure is well maintained and there was no visible sign of damage to the site surface. There was no pooling/ponding of site surface water.

A new bund has been constructed around the oil storage area. Please ensure this meets all necessary standards/requirements.

A minor spillage was found on site, but absorbant granules had already been laid to prevent further spread. It was agreed that this would be cleaned up at the nearest convenience.

No non-compliances were recorded during the visit.

Please email copies of the updated EMS and Fire Prevention and Mitigation Plan (FPMP) at your nearest convenience.

Thank you for your time during the inspection.

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.