

Compliance Assessment Report

Report ID:
CAR_NRW0026436

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

Site	Celtic Recycling Ltd	Permit Ref	UP3998FB			
Operator/Permit holder	Celtic Recycling Ltd					
Regime	Waste Operations					
Date of assessment	08/09/2016	Time in	10:00	Out	11:45	
Assessment type	Audit					
Parts of the permit assessed	Permitted Operations					
Lead officer's name	Davies, Gareth					
Accompanied by						
Recipient's name/position	Keith James/ Managing Director	Date issued	03/10/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	

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

Present

Keith James (KJ) – Celtic Recycling Limited (CRL)

Gareth Davies (GD) – Natural Resources Wales (NRW)

The purpose of the inspection was to assess compliance with environmental permit EPR/UB3998FB. A number of points were discussed during the compliance visit an initial site tour.

During the site tour a number of points were discussed. The basic operations on site have not changed in that the site accepts electrical equipment for dismantling and removal of hazardous components and fluids.

Drainage and Infrastructure

The impermeable surface and drainage on site was in good condition. The site benefits from a plastic impermeable membrane underneath the concrete surface. This ensures that if any damage to the concrete was to occur then it would be stopped by the impermeable membrane. CRL confirmed that tests undertaken on the concrete has shown that the integrity of the concrete has not been compromised. CRL purchased a machine that now benefits from tyres rather than the traditional metal tracks. This ensures that minimal damage to the surface occurs. The drainage channels were clear and are maintained as part of the daily maintenance. There was no pool of water in any areas of the site and interceptor continues to discharge surface water drainage to foul sewer.

The asbestos skip was viewed. The locked asbestos skip is stored within a locked compound.

KJ ran through the transformer treatment process that is undertaken within the building. This treatment process is undertaken within a bunded area within the building. KJ explained that the solvent used to remove PCBs from the transformers is routinely tested and then replaced once it has reached a certain concentration level. Transformers are held within the solvent tanks for specific time periods based on their level of PCB contamination.

Drums of PCBs were being stored on site awaiting removal. The PCBs are removed to different permitted sites dependant on the concentrations. These are kept separate and are appropriately labelled.

KJ confirmed that routine checks are carried out on site and form part of the daily inspection record carried out on site, see examples below.

Permitting and Trials

KJ confirmed that the Draigufel trial is currently on hold due to staff changes within the business.

CRL will be looking to submit a permit variation application in the near future to include the cryogenic treatment process that was initially carried out under a trial. Further to this they will be looking to add additional waste codes to the permit. These waste codes are similar to those that are already within the permit. Please contact GD if a pre-application meeting is required.

SF6 Treatment

A review of the SF6 treatment process was carried out. To date no treatment of wastes containing SF6 has been carried out at the CRL site in Pyle, Bridgend. The treatment would be carried out within the building and by designated trained staff. Designated staff within CRL have received the appropriate external training in the handling of these waste types as required under the legislation. Evidence of this training can be seen below.



The equipment used for de-gassing SF6 equipment is not stored at the site in Pyle as it is mobile equipment. The equipment would be brought from the site in Newport if de-gassing of SF6 equipment was needed to be done. There is the potential that some SF6 de-gassing is undertaken at the location the waste is generated in the field. This is dependent on specific circumstances.

There is very little load rejection for material received at CRL. Large proportions of the imported wastes are pre-arranged from known contractors. A copy of the 'Principles of safe working – SF6 Handling Practices' was reviewed.



Barnsley
T: +44 (0) 1226 786 679 F: +44 (0) 1226 786 690
Bridgend
T: +44 (0) 1656 745 777 F: +44 (0) 1656 745 888
Newport
T: +44 (0) 1633 274 700 F: +44 (0) 1633 274 888
info@celtic-recycling.co.uk
www.celtic-recycling.co.uk

PRINCIPLES OF SAFE WORKING

SF₆ HANDLING PRACTICES

Doc Ref: SHE-PSW-DIS-SF6HP-v4

AUTHOR			
WRITTEN BY	DESIGNATION	SIGNATURE	DATE OF ASSESSMENT
Alun Williams	Hazardous Waste Supervisor		7 April 2016
APPROVAL			
REVIEWED BY	DESIGNATION	SIGNATURE	DATE OF APPROVAL
Iain Kerr	Depot Manager (Newport)		7 April 2016
			DATE OF NEXT REVIEW
			6 April 2018

Additional information and conditions for reassessment

Any clarification required in respect of this document or any proposed amendments shall be addressed with Celtic Recycling Limited's, Managing Director.

The procedure will be reviewed every two years unless there are any significant changes which would indicate that it is no longer suitable and sufficient.

Should this occur, an immediate review will be undertaken and appropriate actions identified and implemented to ensure that an effective procedure is in place at all times.



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Hazardous Waste and Reporting

A demonstration was given of the computer system used to log incoming and outgoing wastes into the site. This systems is used to produce the waste returns that are submitted to NRW. KJ confirmed that CRL produce the majority of hazardous waste consignment notes for wastes imported to site. In the main these are pre-populated as it is known the waste types that will be collected and the known contaminants. An internal review was carried out following the publication of 'Waste Classification, Guidance on the classification and assessment of waste (1st edition 2015) – Technical Guidance WM3' in order to make note of any changes.

A number of Hazardous Waste Consignment Notes were inspected. All of the relevant information has been included in full. KJ confirmed that CRL were aware that premise codes were no longer used in England. GD confirmed that Wales will be continuing to use premises code for wastes produced in Wales.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012.

END

EPR Compliance Assessment Report

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Site	Celtic Recycling Ltd	Permit Ref	UP3998FB
Operator/Permit holder	Celtic Recycling Ltd	Date	08/09/2016

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.