

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

Site	Celtic Recycling Ltd		Permit Ref	34089		
Operator/ Permit holder	Celtic Recycling Ltd					
Date	30/07/2015	Time in	10:00	Out	11:45	
What parts of the permit were assessed	Permitted area					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Keith James - Managing Director					
Officer's name	Gareth M Davies, Guy Baskerville		Date issued	13/08/2015		

## Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
<b>a) Permitted activities</b>	1. Specified by permit	A	
<b>b) Infrastructure</b>	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
<b>c) General management</b>	1. Staff competency/ training	A	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
<b>d) Incident management</b>	1. Site security	A	
	2. Accident, emergency & incident planning	N	
<b>e) Emissions</b>	1. Air	NA	
	2. Land & Groundwater	NA	
	3. Surface water	NA	
	4. Sewer	A	
	5. Waste	NA	
<b>f) Amenity</b>	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	1. Efficient use of raw materials	NA	
	2. Energy	NA	

**KEY: C1, C2, C3, C4 = CCS breach category ( \* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored**

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (see section 5 for scoring scheme)	0
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**If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Present

Keith James – Managing Director, Celtic Recycling Limited.

Guy Baskerville – Pollution Prevention Compliance Officer, Natural Resources Wales.

Gareth Davies – Senior Environment Officer, Natural Resources Wales.

Paul Owen – Operations Director, Celtic Recycling Limited (Site Tour only)

Danny Reynolds – Site Foreman (Pyle), Celtic Recycling Limited (Site Tour only)

The purpose of the inspection was to act as a handover from Guy Baskerville to Gareth Davies who will now be the regulatory officer for the Celtic Recycling Limited (CRL) site in Pyle. Keith James gave an introduction to the operations carried out by CRL at the site in Pyle followed by a site tour.

The site is permitted to accept and treat large heavy electrical equipment from National Grid and other suppliers in the electricity industry. The treatment options include the storage and treatment of wastes containing polychlorinated biphenyls (PCBs), ozone depleting substances (ODS) and hexafluoride (SF6) gas. Other treatment operations carried out by CRL include manual sorting of different metals and grades, flame cutting for size reduction and granulation of cables. Asbestos is also accepted on site. Small amounts of asbestos are generated while completing off-site activities and these are brought back and placed in a designated skip prior to disposal. A photograph of the asbestos skip can be seen below. The skip is locked and is also in a further locked area of the site. A photograph of the locked skip can be seen below.



Trials

CRL were granted a Regulatory Position Statement for the trial of the cryogenic treatment of bitumen encrusted waste electrical components. The initial trial has been completed and a report is currently being prepared for submission to Natural Resources Wales. Keith James confirmed that following the outcome of the trial, CRL will be submitting a permit variation to Natural Resources Wales. CRL's consultants will be in contact to arrange a pre-application meeting to discuss the application.

The Draigufel trial is currently on hold as the trial plant has not been fully completed. Please notify Natural Resources Wales when CRL intend to start the Draigufel process.

### Drainage

Work has been completed on the connection to the foul sewer from the interceptor. This work was overseen by M Rowe (Civil Engineering) Ltd (MRL) and the engineering drawings have been submitted to and received by Natural Resources Wales. The photograph below (left) shows the final chamber after the water has passed through the interceptor. The water is then pumped to sewer under agreement from Dwr Cymru Welsh Water. The photograph below (right) shows where the water is pumped into the foul sewer. The pump is activated when the water reaches a certain level. The previous discharge to the water course has been bunged off. It should be noted that it was not possible to view the bung due to the water level. I would recommend that the bung is periodically checked to ensure it maintains its integrity.



I can confirm that Natural Resources Wales is satisfied that these works have been completed in accordance with documentation dated 24 October 2014 provided by MRL. This also satisfies the requirements of condition 2.5.1 in that 'The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales

The perimeter of the site has an open channel that collects surface water run-off during periods of rainfall. Photographs of the channel can be seen below. The drainage runs around the perimeter of the site and then connects into the interceptor. The drainage system is also served by a coalescer to aid the removal of any emulsified oils.



The impermeable pavement was in good condition. There was one area of impermeable pavement that was showing signs of wear. A repair of this is scheduled to be completed in 2016. The connection to the sewer was given priority over these repair works and was agreed with Guy Baskerville. A photograph of this area can be seen below.



#### Technical Competence

Following the visit Keith James provided electronic copies of Technical Competence and Continued Competence Certificates for Alun Williams and Paul Williams. Alun Williams and Paul Williams are the nominated technically competent person for the Pyle site. This ensures compliance with condition 1.1.4.

END

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Operator/ Permit	Celtic Recycling Ltd	Date	30/07/2015

**Section 3- Enforcement Response** **Only one of the boxes below should be ticked**

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

**Section 4- Action(s)**

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which could have a <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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](mailto: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.