

Compliance Assessment Report

Report ID:
CAR_NRW0033141

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

Site	Ammanford Metal Recycling	Permit Ref	RP3098FM			
Operator/Permit holder	Ammanford Recycling Ltd					
Regime	Waste Operations					
Date of assessment	14/03/2018	Time in	11:00	Out	12:30	
Assessment type	Audit					
Parts of the permit assessed	Site					
Lead officer's name	Lloyd, Cathy					
Accompanied by	Ellar, David					
Recipient's name/position	Adrian Stewart/ Director	Date issued	15/06/2018			

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
A1 - Specified by permit	C2	2.1.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	X	
B4 - Infrastructure - Containment of stored materials	X	
B5 - Infrastructure - Plant and equipment	X	
F2 - Amenity - Noise	X	

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	1	Total compliance score (see section 5 for scoring scheme)	31
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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

CAR Form resent to different email address:

Adrian.stewart@epsmr.co.uk

Present

Anne Marie Orrells and Christine Rees - HSE

Cathy Lloyd and Dave Ella - NRW

Adrian Stuart - Ammanford Metal Recycling

This is the first site inspection following the prohibition notices issued by the HSE.

Most of the ELVs that were being stockpiled on the impermeable pad next to the vehicle depollution area had been removed. The impermeable pad appeared clean and there were no visible sign of any oil spillages.

Photograph of impermeable pad next to depollution bay



Gas cylinders now have a designated locked storage area. Please update your Environmental Management System to show the procedure for the storage and use of gas cylinders.

Photo to show the designated gas cylinder storage area located to the north east of the site



ELVs were being stored on the T9 exemption area and deliveries of ELVs were still being accepted to this area. This is unacceptable as vehicles are not authorised under a T9 exemption. Many of the ELVs stored in this area were damaged and there is a high risk of polluting matter draining to permeable ground. This is a Category 2 breach of condition 1.1 as this is unauthorised activity. This is not what was agreed during the last meeting when Adrian Stewart agreed to remove the un-depolluted ELVs from the site and take them to a site authorised to treat them. All ELVs must be removed from the T9 exempt area.

Photo showing T9 exempt area with storage of un-depolluted ELV's.

**Spill kits**

A number of spill kits have been purchased and were available in a number of locations on site.

Noise Complaint

On 9 March 2018 NRW received a noise complaint.. I contacted the site the same day and was told the complaint was going to be investigated by Steve Melbourne. Please provide the results of this investigation.

DCWW

Welsh Water have agreed in principle to a connection to the foul sewer via a first class oil interceptor. Presently surface water is collected in two sealed units which require regular emptying. Please provide the hazardous waste consignment notes generated from the removal of contaminated surface water. Please provide hazardous waste consignment notes for the removal of contaminated surface water for the period July 2017 to March 2018.

EPR Compliance Assessment Report

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Operator/Permit holder	Ammanford Recycling Ltd	Date	14/03/2018

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			
B4	X	Please provide the hazardous waste consignment notes generated from the removal of ELVs from the site, between January 2018 to March 2018.	15/05/2018
A1	C2	Remove non depolluted end of life vehicles from the T9 exemption area.	28/06/2018
B5	X	Please update your Environmental Management System to show the procedure for the storage and use of gas cylinders.	15/05/2018
B3	X	Please provide hazardous waste consignment notes for the removal of contaminated surface water for the period July 2017 to March 2018.	15/05/2018
F2	X	Please provide the results of the investigation into the noise complaint NRW received on the 9 March 2018	15/05/2018

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.