

Compliance Assessment Report

Report ID:
CAR_NRW0034753

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

Site	S L Recycling Ltd	Permit Ref	ZB3593HH		
Operator/Permit holder	S L Recycling Limited				
Regime	Waste Operations				
Date of assessment	21/02/2019	Time in	10:30	Out	11:10
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by	Lee, Jonathan				
Recipient's name/position	Steve Morgan, Becky Tucker, Stacey Lewis/ TCM, Director	Date issued	27/02/2019		

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	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	X	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Officers Alex BOWDER and Jonathan LEE attended SL Recycling Ltd at 10:30 on Thursday 21st February 2019 to carry out a routine inspection of permit **EPR-ZB3593HH**. Met with Technically Competent Managers Steve Morgan and Becky Tucker who accompanied Officers around the yard. Weather conditions were mild and dry at the time of the visit.

PREVIOUS CAR FORM ACTIONS

- Manage the storage heights of scrap metal piles to comply with FPMP.

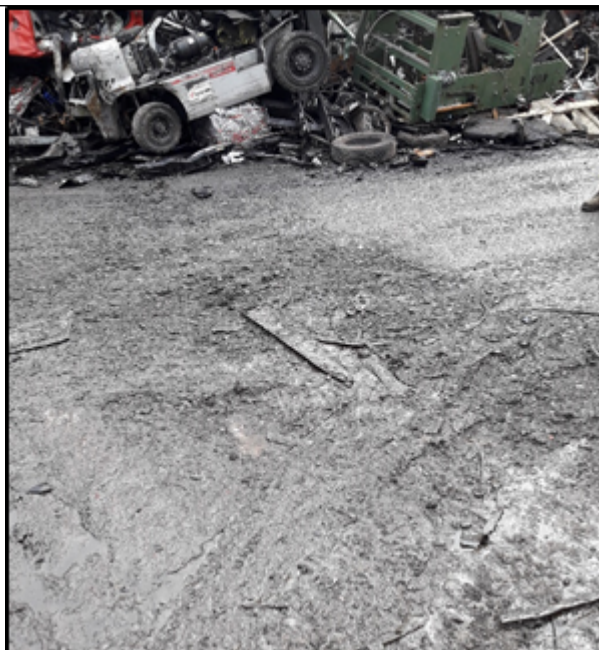
At the time of the visit the main scrap pile in the centre of the yard seemed **higher than four metres**. Staff stated that this was due to machinery breakdowns and planning of the new site in Pontypool. Please ensure to that scrap height is managed below this level going forward.

GENERAL OBSERVATIONS

INFRASTRUCTURE

The infrastructure of the yard surface leading towards the depollution bay has become weakened in certain areas. Structural wiring could be seen coming through the surface. This indicates that wear and tear of general operations on site have broken through a layer of the concrete flooring. These areas need be restored to ensure the surface is impermeable and that everything is captured by the drainage system.

ACTION: Restore weakened surface areas to an impermeable status.



Picture 1 – showing weakened infrastructure in the yard

Officers noticed a large sink hole in the surface beneath the grabber machine. This is said to assist with sorting of the materials - however, you must make sure that this has not compromised the infrastructure requirement of the permit to be sealed. If water can percolate through the ground layers this needs addressing and resealing to comply with your permit.

Small patches of oil could be seen amongst metal parts on the yard floor. This is to be expected from materials, but staff must remain vigilant and keep spill kits in regular use to highlight spills and ensure that contaminants are captured.

ENGINE STORAGE

Officers also highlighted the precarious stacking of depolluted engines. If a vehicle were to crash into this stack, it is unlikely to be completely stable and so could pose a serious Health and Safety risk. **Better storage techniques need to be implemented on site when space is limited.**



Picture 2 – showing the stacking of extracted vehicle engines in the

Officers briefly spoke about contingency plans for machinery breakdowns, these should be detailed in your EMS.

SITE IN PONTYPOOL

The business has recently submitted an application to NRW to operate a Waste Transfer Station and ELV centre in the Pontyfelin Industrial Estate, NP4 0DQ. The business is currently awaiting response to determine the status of the application.

If issued, the business intends on changing the use and focus of the current Penallta Yard to a storage site rather than treatment. The site questioned whether the business could vary the permit to alter yard activities to include a Waste Transfer Station operation. This can be discussed once activities have been decided.

AMENITY ISSUES

No noise complaints have been received by NRW since the last inspection.

Regarding the new site, NRW have advised the business to contact the Local Authority to gain information on planning consent regarding amenity issues. Spoke about a strict Noise Prevention Plan that would need to be implemented at the new site.

It is important to note that activities cannot commence until the permit has been issued. The exemptions must be adhered to and NRW will be completing a compliance check in the next few weeks.

WASTE RETURN DOCUMENTS

The business' annual waste return spreadsheet was submitted on 4th January 2019. It has been declared that the site has received approximately 13,770 tonnes of various waste types to site and removed 14,993 tonnes.

This is within the maximum quantity allowance to be accepted which is 25,000 tonnes per year. No issues noted.

If you have any issues with this report, please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

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

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EPR Compliance Assessment Report

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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			
C4	X	Improve storage techniques for depolluted engines on site	06/03/2019
B1	X	Restore all weakened infrastructure areas to an impermeable status.	27/05/2019

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.