



Name of site: Swansea Recycling Centre Operator/permit holder: Terrence Attewell Permit ref no: EAWML 101133  
 Officer: David Morgan Date: 24/10/2012 Area/office: South West - Llandarcy  
 Activity: ELV & Mixed Recycling Time in/out: 10:00 - 12:00 Event type:  Routine  Incident response  Other  
 Assessment type:  Site inspection  Audit  Check monitoring/sampling  Report/data review  Procedure review  
 Site life status:  Operational  Pre-operational  Post-operational  
 What part(s) of the permit were assessed? A, B, C, D, F

Compliance assessment summary

Key to completion: A = Assessed/Assessed in part (no evidence of non-compliance) ATL = Approach to limit  
 NA = Not Applicable 1, 2, 3, 4 = CCS cat 1-4 breach N = Not assessed

						Conditions breached					
a) Permitted activities	1	A									
b) Infrastructure	1	N	2	N	3	C2	4	N	5	N	3.1.1
c) General management	1	N	2	N	3	A	4	C3			3.1.1
d) Incident management	1	A	2	N							
e) Emissions	1	N	2	N	3	N	4	N	5	N	
f) Amenity	1	A	2	A	3	A	4	A	5	A	
g) Monitoring and records, maintenance and reporting	1	N	2	N	3	N	4	N			
h) Resources efficiency	1	N	2	N							

The breaches indicated above may constitute one or more offences. You should take immediate action to rectify each breach and return to compliance. You should prevent any repetition of the breaches. Breaches of conditions as indicated above can result in criminal prosecutions and/or suspension or revocation of a permit.  
 NB if there is a breach, only one of the following will have an 'x' placed in the box as the initial enforcement response.

We will now consider what enforcement action is appropriate.  At present we do not intend to prosecute you for the above offences. However, you are warned that this may change if further relevant information comes to light. This is a site warning.  We have given you advice.

Review of Directly Applicable Legislation: key: A = Assessed, N = Not assessed, NA = Not Applicable, C1,C2,C3,C4 = CCS cat 1-4 breach.

Report delivery method:  copy left on site  posted  Emailed  faxed Date: 15/11/2012

A planned audit was undertaken on site on Wednesday 24th October 2012. The purpose of the audit was to inspect the following areas of the activity and assess compliance with the environmental permit that is held by the operator;

**Permit Suitability**  
 In relation to permit suitability an inspection of the site and its activities was undertaken. At the time of the inspection the main activities on site included metals recycling and vehicle de-pollution. These activities are operated in line with the Standard Rules sets for Household, Commercial and Industrial Transfer Station and End-of-life vehicle de-pollution.

**Environment Management System**  
 The Environment Management System held on file by the Environment Agency is outdated as it does not cover procedures and activities regarding the scrap metal activities. An updated copy of the management plan was available on site and it was agreed a copy would be forwarded on to me for review. The management system will be reviewed and feedback will be provided in a follow-up inspection report.

**Site Infrastructure (drainage & site surface)**  
 It is a requirement of the permit that all waste is stored and treated on areas of the site where there is an impermeable surface and sealed drainage system. At the time of the inspection there did not appear to be a drainage system in place. At the current time it appears that all surface water runs to unmade ground on site or to a surface water drain outside the entrance of the site.

As a result of there being no sealed drainage system and potentially contaminated run-off from site entering the surface water system 3.1.1 of the permit was breached (Category 2 breach – Significant) (ref:B3)

Continued.....

Officer's Signature: David Mogn Recipient's name or position within company: Terrence Attewell

Continuation sheet used: Yes No of pages: 1 CCS record number: 186966

## Notes to the recipient

This compliance report form may highlight non-compliance with your permit or directly applicable legislation as observed by the Environment Agency officer.

This does not relieve the site operator of their responsibility to ensure that they comply with the permit and to prevent pollution of the environment. You are also reminded that:

- you should comply with the conditions of the permit at all times
- compliance with the permit does not remove your obligation to comply with other legislative provisions which may apply.

## Understanding the Compliance Assessment Summary

a) Permitted activities	1	Specified by permit
b) Infrastructure	1	Engineering for prevention and control of emissions
	2	Closure and decommissioning
	3	Site drainage engineering (clean and foul)
	4	Containment of stored materials
	5	Plant and equipment
c) General management	1	Staff competency/training
	2	Management system and operating procedures
	3	Materials acceptance
	4	Storage, handling, labelling and segregation
d) Incident management	1	Site security
	2	Accident, emergency and incident planning
e) Emissions	1	Air
	2	Land and groundwater
	3	Surface water
	4	Sewer
	5	Waste
f) Amenity	1	Odour
	2	Noise
	3	Dust/fibres/particulates and litter
	4	Pests, birds and scavengers
	5	Deposits on road
g) Monitoring and records, maintenance and reporting	1	Monitoring of emissions and environment
	2	Records of activity, site diary/journal/ events
	3	Maintenance records
	4	Reporting and notification to the Environment Agency
h) Resource efficiency	1	Efficient use of raw materials
	2	Energy efficiency

The term 'permit' for the purposes of this form includes: licences, authorisations and consents.

## Understanding your non-compliance scores

Non-compliance findings are classified using our published Compliance Classification Scheme, (CCS).

This scheme categorises breaches of permit conditions based on their potential for environmental impact as shown below. If you wish to discuss further any comments made by the officer on this form, contact your local area office or for more details of the CCS scheme, see the Environment Agency's website or contact your local office.

CCS category	Description	Score
1	A non-compliance which has a potentially <b>major</b> environmental effect	60
2	A non-compliance which has a potentially <b>significant</b> environmental effect	31
3	A non-compliance which has a potentially <b>minor</b> environmental effect	4
4	A non-compliance which has <b>no</b> potential environmental effect	1

## Corrective action

We have various options to ensure that you correct actual or potential non-compliance. We may

- advise on corrective actions, verbally or in writing and require you to take specific actions, by letter or by issuing a notice.
- require you to review your procedures or management systems
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit is an offence, and we may take legal action:

- We will normally provide advice/guidance to assist operators back into compliance. However, other than for a very minor offence this will normally be in conjunction with another enforcement response.
- Where we have issued a written warning this does not preclude us from taking additional enforcement action if further relevant information comes to light. Such action includes the issue of a formal caution, taking a prosecution and/or the service of a notice.

We have published our Enforcement and Prosecution Policy which seeks to achieve a consistent approach to enforcement across all our regulated activities.

## Operational Risk Appraisal (Opra)

Compliance assessment findings may affect your Opra score. This score determines your charge and affects the allocation of our resources to check your compliance with the permit.

## Data protection notice

The Environment Agency is responsible for regulating environmental protection, flood defence, water resources and fisheries. It has a duty to discharge its functions to protect and enhance the environment and to promote conservation and recreation. The information provided will be processed by the Environment Agency to fulfill its regulatory and monitoring functions, and to maintain the relevant public register(s). The Environment Agency 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, emergency services) 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 Environment Agency 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 Environment Agency 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 the assessment 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 the 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 manager, Area Environment Manager or Area Manager. If you wish to raise your dispute further, this can be done through our official Complaints and Commendations procedure phone our general enquiry number 08708 506506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team, alternatively you can send an email to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk). If, after following our Complaints and Commendations procedure, you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the Parliamentary Ombudsman phone their helpline on 0345 015 4033.



Condition 3.1.1 states that waste must be stored on an impermeable surface with a sealed drainage system. It has been noted that there are intentions to make site improvements and invest in installing necessary drainage measures (i.e. drains, gullies, an interceptor etc.). Installation of these measures will be guided by the 'Site Improvement Plan' which has been agreed by the officer (D. Morgan) and the site management.

**Other observations**

Condition 3.1.1 of the permit was also breached in that large volumes of waste are stored in areas of the site where there is not an impermeable surface. This has the potential for contamination of unmade ground. (Category 3 breach – Minor) (ref: C4).

Condition 3.1.1 states that waste must be stored on an impermeable surface. It was noted that a section of the yard has recently been re-surfaced and appears to be in a very good condition. The practice of regularly inspecting and maintaining the site surface will ensure compliance with this condition in the future.

It was also noted that efforts are being made to clear waste from areas of the site where wastes are stored on unmade ground.

**Site Improvement Plan**

A site improvement plan has been drawn up and agreed by the regulating officer (D. Morgan) and the site management. A list of actions has been created, some of which are due for completion before November 15th 2012.

Please see the attached improvement plan that was agreed and ensure actions are completed within the agreed timelines.



## Part one- Audit reference information

<b>Permit number</b>	101133	<b>Site name</b>	Swansea Recycling Centre
<b>Date(s) of audit</b>	24/10/2012	<b>CAR ID No.</b>	A/121024/101133
<b>Lead auditor</b>	David Morgan	<b>Other auditors</b>	n/a

## Part two - Scope of audit

The scope of this audit is to inspect and assess the following areas of the Swansea Recycling Centre waste management operation;

### **1. Permit Suitability**

Swansea Recycling Centre recently varied their permit to include scrap metal operations on an adjacent site. The adjacent site which operated under the 'Lorey Metals' permit now falls under the Swansea Recycling Centre permit.

The Swansea Recycling Centre permit is made up of the three standard rules conditions which are; End-of-life vehicle de-pollution facility, Authorised WEEE Treatment facility and Household, Commercial and Industrial Transfer Station. There is also a T9 exemption registered on site. This audit will aim to clearly mark out and separate the activities of the permit and the exemption.

This audit will assess the permit suitability and compliance with the permit. It was noted in the last inspection that the site's only waste management activities ongoing on site are the metal recycling and de-pollution of motor vehicles.

### **2. Review of the Environment Management System**

The most recent copy of the environment management system on file is from 2009. We do not currently hold a copy which includes activities under the new permit. The updated management system will be reviewed to ensure it incorporates activities in the current operation.

### **3. Infrastructure**

There is no drainage plan for the site and it is unclear what drainage system is in place. It is possible that the entrance to the yard and the immediate area inside the site is draining to a rainwater gully in the street. This in turn leads to a Swansea Council maintained interceptor which discharges via the surface water system into the Fendrod lake.

An inspection of the site surface will be undertaken. Waste storage areas will be inspected to ensure waste is stored on surfaces in compliance with the permit (impermeable surfaces with sealed drainage).

**Part three - Permit conditions**

The table below summarises what permit conditions were audited, areas of non-compliance and suggested corrective action.

Permit condition	CAR sub-criteria	Comments and suggested corrective action	Proposed date for completion	CCS score 4 – 1	Environment Agency proposed response
1.1.1	C2	An updated Environment Management System was provided on site. This will be reviewed and feedback will be given to site. A copy of the EMS will be sent through to D. Morgan at nearest convenience.	31/10/2012	Pending	
3.1.1	B3	There is no drainage system on site. The area on site in close proximity to the site entrance drains into a rainwater gully in the street. This does comply with the requirement of a sealed drainage system.  Large areas of the yard are not hard-standing or impermeable and have large volumes of waste stored on them.	To be agreed in action plan	Category 2	Advice & Guidance to be given. Agreed works to be formalised in improvement plan.
1.1.1	A1	A review of the permit suitability is required. The site currently holds SRP sets for a HCI transfer station, WEEE ATF and ELV. The main activities on site are metal recycling and small scale ELV. A decision on what SRP option to take should be made following a discussion on site regarding the direction they want to take the business. It is possible a variation is required.	To be agreed following further discussion	Assessed and Compliant	

#### Part four - Observations

There does not appear to be any drainage system serving the site itself. The only visible drain is outside the front gate of the site. This drain leads to a rain water gully to the Fendrod lake via a local authority owned interceptor.

It has been noted that the operator will install drainage measures to ensure the site has a sealed drainage system. An interceptor was ordered and engineering works for the site have been planned. In the meantime action should be taken to ensure surface water does not leave site and enter the street drain below.



Large quantities of waste are stored on unmade ground. All waste must be stored on an impermeable surface\* with a sealed drainage system (*see definition below*).



An agreement (documented within the site improvement plan attached) has been made to clear waste from these areas so the site surface can be inspected. This activity will be arranged on site through visits and will be written into the site improvement plan.

It was noted that the permit will be varied and the name of the permit will change to 'Lorey Metals'.

The storage tank for waste oil is single-skinned and stored outside. It was empty at the time of inspection and it was noted that a new waste oil storage tank to be purchased.

There are plans to join the two units together (site previously known as Swansea Recycling Centre and site previously known as Lorey Metals). This will include gaining planning permission to remove the bank between the two units.

\* The following definitions of impermeable surface and sealed drainage system are taken from the environmental permit;

**“impermeable surface”** means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term sealed drainage.

\* **“sealed drainage system”** in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and will ensure that:

- a) No liquid will run off the site surface otherwise than via the system;
- b) Except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump

## Part five – Actions/recommendations

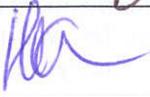
The operator will now follow an improvement plan agreed between the regulating officer (D. Morgan) and the site management. This will include actions which are to be taken to ensure compliance with the permit, most notably;

- Undertaking operations in line with Environment Management System
- Engineering and maintaining an impermeable surface with sealed drainage system
- Acceptance, treating and storage of waste upon suitable areas of the site (impermeable surface with sealed drainage system)

Other checks for compliance with the permit will be inspected in follow up visits in the future. This will include among others;

- Waste acceptance (ensuring no non-permitted wastes are accepted on site)
- Duty of Care information (transfer & consignment notes to be prepared and retained)
- Appropriate Materials storage & treatment (storage of waste oils, treatment processes for wastes)
- Waste returns (ensuring waste returns are submitted in line with required timescales with accurate information)
- Assessment of the vehicle de-pollution process on site

Part six - Report approval

<b>Lead auditor</b>	David Morgan	<b>Signed</b>		<b>Date</b>	7/11/12
<b>Report authorised by</b>	Hamish Osborn	<b>Signed</b>		<b>Date</b>	8/11/12
<b>Job title</b>	Team Leader Environment Management				

**Swansea Recycling Centre**

**Site Improvement Plan - 2012**

Action	Completion Date	Operator Completion	Environment Agency Officer
<b>Actions from audit</b>			
<b>24/10/2012</b>			
1. Remove all cars from Unit 8	15/11/2012		
2. All vehicles to be stored in adjacent unit	15/11/2012		
3. Order Oil Interceptor	15/11/2012		
4. Bailer to be serviced	15/11/2012		
5. All liquids to be stored in shed in unit 8. New diesel tank ordered.	15/11/2012		
6. Waste oil tank to be ordered (with secondary containment/double skinned).	15/11/2012		
7. Meeting to organise site drainage improvements.	15/11/2012		
8. Contact Dwr Cymru to discuss discharge application	15/11/2012		
9. Begin planning process to merge two sites into one (Swansea Recycling Centre & Lorey's yards)	15/11/2012		
10. Provide EA with EMS and Site Action Plan	15/11/2012		
11. Order signs for waste acceptance (for customers)	15/11/2012		
12. Begin clearing site. Iron and scrap from far left corner to be removed. Site surface to be inspected by D. Morgan	Date to be agreed with operator.		
13. Update EMS in line with improvements	Date to be agreed with operator.		

