



Cyfoeth Naturiol Cymru Natural Resources Wales

Deborah Attewell
Lorey Metals
Unit 8
Ferryboat Close
Swansea Enterprise Park
Swansea
SA6 8QN

Date: 21/10/2014

Dear Debbie

RE: Regulation 36 Enforcement Notice

Following my visit to site on 20th October 2014 I would like to provide you with the following feedback.

The purpose of the visit was to assess compliance with the Regulation 36 Notice under the Environmental Permitting (England and Wales) Regulations 2010 that was served on you on 27th August 2014. The notice required the following steps to be taken by 20th October 2014 in order to secure compliance with the Environmental Permit;

- Develop an Environmental Management System for the site
- Make copies of the Environmental Permit and Environmental Management System available to staff on site
- Remove all non-permitted wastes from site
- Provide Secondary containment for all waste oils/liquids
- Review the operational status of all plant and equipment on site and notify Natural Resources Wales of any breakdown/failures of equipment & plant

Thank you for sending a copy of the Environment Management System (EMS) and review of equipment and plant (both received Wednesday 15th October 2014). I will now review these documents and provide you with feedback. During my visit to site yesterday I noted that copies of the EMS and permit have been made available to staff on site. I now consider these steps of the notice to have been complied with.

However, following an inspection of the site it became clear that two steps of the notice required to be completed by 20th October 2014 were not completed. The following steps of the notice were not complied with;

- Remove all non-permitted waste
There was still a large volume of waste electrical items mixed with the main scrap metal storage. The site is not permitted to take waste electrical and electronic equipment and this waste stream (WEEE) must be treated in line with the requirements of Annex III of the WEEE directive. It is not currently being treated on site in line with the directive and in any case, you are not permitted to accept this waste stream.
- Provide secondary containment for all waste oils/liquids
There is no secondary containment for any of the waste oils and/or liquids on site.

Natural Resources Wales/Cyfoeth Naturiol Cymru
Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ.
Llinell gwasanaethau cwsmeriaid/Customer services line: 0300 065 3000
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

A record of this non-compliance with the enforcement notice has been made. Further potential enforcement action in line with our enforcement and sanctions guidance will be decided following expiration of the notice (final item to be completed by 2nd February 2014) when we will review compliance with all steps of the notice.

Please be advised that it is your legal responsibility to remove all non-permitted waste from site and provide secondary containment for oils/liquids so as to become compliant with the environmental permit. Non-compliances noted in all future inspections will be dealt with accordingly.

I would like to take this opportunity to remind you that the next scheduled step of the notice, due to be completed by 8th December 2014, is the removal of all waste from areas of the site where there is unmade ground.

Thank you for your time during the inspection. If you have any questions regarding this letter or the content of the notice please contact me on the details below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Morgan', is positioned above the printed name.

David Morgan

Environment Officer – Swansea Environment Management Team

Natural Resources Wales

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