

Compliance Assessment Report

Report ID:
CAR_NRW0035235

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	11/06/2019	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						
Recipient's name/position	Stacey Lewis, Steve Morgan, Becky Tucker, Stacey Lewis/ Director and TCMs		Date issued	13/06/2019		

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	A	
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
-----------------------------	---	---	---

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

Officer Alex BOWDER attended SL Recycling Ltd at 10:30 on Tuesday 11th June 2019 to carry out the Quarter 1 inspection of permit **EPR-ZB3593HH**. Met with Technically Competent Manager Steve Morgan who accompanied the Officer around the yard and demonstrated the site's vehicle depollution process. Weather conditions were raining at the time of the visit.

PREVIOUS CAR FORM ACTIONS

- Manage the storage heights of scrap metal piles to comply with FPMP guidance - **Complete**

VEHICLE DEPOLLUTION

Thank you to the site for demonstrating the site's vehicle depollution process. The depollution bay is sunken within the impermeable surfaced unit to ensure all hazardous liquids are contained within the bay and cleaned up with absorbent spill skit material. Appropriate use of spill kit material was noted around the area.

The vehicle is first raised to gain full access underneath the unit. A worker then will puncture the various tanks and either extract the liquid via a suction tank or leave to drain by gravity into an appropriate container/tanker. The liquid is left to drain until empty and then the hole is resealed with a fit-for-purpose bund to prevent any leakage occurring. These liquids are then stored in relevant labelled canisters and collected from site by an authorised contractor.

The Officer spoke about whether the site drains the fluid from vehicle shock absorbers. It was stated that these components in modern vehicles are completely sealed, making it difficult to access without completely dismantling and breaking the section apart.



Picture 1 – showing vehicle depollution bay. Punctured oil tank draining into container – taken 11/06/19

The Officer inspected the sunken area in the infrastructure beneath the grabber machine. This is said to be completely sealed and the site will look to fill in and level the area if operations are to change going forward.

DEPOLLUTED ENGINES

The site recently moved depolluted engines to their Pontypool New Inn yard, due to the volume and queried storage methods on last inspection. These units have since been moved back to Penallta under the EWC code **16 01 22** – as they were classed an unauthorised waste type to be stored at this yard.

The height of the main scrap pile in the centre of the yard, along with other waste streams, were complaint with the FPMP guidelines at the time of inspection. Depolluted engines are still being stored on the east boundary towards the depollution bay.

Please be mindful of safe and proper storage to ensure H&S and to see that all residual oils/fuels that leak out from units are cleaned up immediately.

INFRASTRUCTURE

As mentioned on CAR Form **CAR_NRW0034753**, some areas of the yard surface have become exposed with the metal wiring appearing. The site must ensure all areas are restored to impermeable status to ensure everything is contained within the site's sealed system. The site stated that it intends to fully repair the entire surface once the change in operations occur, as this will provide more space.



Picture 2 – showing a weakened infrastructure area with the metal wiring exposed, taken 11/06/19

No issues apparent with drainage system at the time of inspection. Appropriate storage of segregated metal types witnessed.

PERMIT VARIATION

The business is currently awaiting a response to the determination of the permit application **PAN-004719**. The site questioned whether the business could vary the Penallta yard permit to alter yard activities to include a Waste Transfer Station operation. This is possible, and the business can apply for pre-application advice with NRW if necessary.

The site must ensure no unauthorised waste activity or material is accepted on site until an appropriate permit has been issued.

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

--

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035235**

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	Date	11/06/2019

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			
B1	X	Restore weakened infrastructure areas to uphold its impermeable status.	13/09/2019

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.