

Compliance Assessment Report

Report ID:
CAR_NRW0031528

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

Site	Heads Of The Valley Salvage Limited		Permit Ref	YP3992EN	
Operator/Permit holder	Heads Of The Valley Salvage Limited				
Regime	Waste Operations				
Date of assessment	27/03/2017	Time in	14:00	Out	15:00
Assessment type	Site Inspection				
Parts of the permit assessed	Operational area				
Lead officer's name	Tye, Laoni				
Accompanied by	Dearle, Nessa				
Recipient's name/position	Colin Williams and Neil Williams/ TCM and director	Date issued	15/12/2017		

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
C2 - General Management - Management system and operating procedures	C3 - Suspended	1.1.1
C4 - General Management - Storage, handling labelling and Segregation	C3 - Suspended	Table S1.1
E3 - Emissions - Surface water	C3 - Suspended	2.5.1

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	3	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

This CAR form was originally issued on the 03/0517 but has been re-issued due to a correction. The scores should have been suspended but were activated. Correction made

Environment officers Laoni Tye and Nessa Dearle visited site on the 27th March 2017 and met with Colin and Neil Williams and John Harrison. The weather was warm and dry at the time of the visit. The purpose of the visit was to conduct an inspection and check up on progress from actions in previous CAR form. This was the first visit since the new bespoke permit has been issued.

There were a number of breaches recorded during the visit. Please see details below.

C2 Management – Management systems and operating procedures. Category 3 breach.Suspended**
Condition 1.1.1 states that the operator shall manage and operate the activities: a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances'.

There are a number of issues on site that are due a lack of proper management on site in line with the management system in place. There were areas of heavy oil contamination on site especially around the crusher where oil has been noticed on several occasions. We have notified you of this non-compliance on a number of occasions and included it in CAR forms with no response or action taken. As discussed on site any oil that has leaked onto any areas of the site needs to be cleaned up as soon as possible and disposed of correctly. These issues need to be recorded, in your case on the daily sheets you complete and not only recorded but rectified also. This is contributing to the amount of oil in the interceptor which is currently not working effectively and is discharging oil into the drainage ditch.

Action: Please see compliance notice

E3 – Emissions – Water. Category 3 breach. Suspended**

Permit condition 2.5.1 states that the operator shall complete the improvements specified in schedule 1 table S1.3. This condition is related to upgrading the interceptor to meet class one standards and the deadline for which was the 31st March 2017. The current interceptor is not working effectively and it is causing a pollution and discharge of oil to the drainage ditch on site.

Action: Please see notice.

C4 Management – Storage, handling, labelling and segregation. Category 3 breach. Suspended**

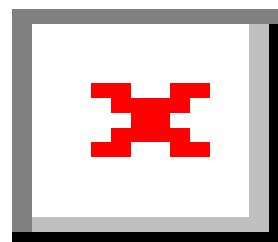
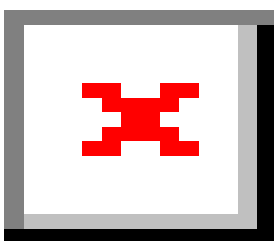
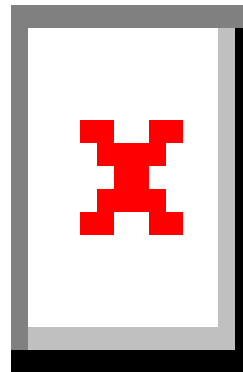
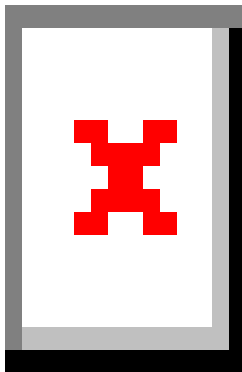
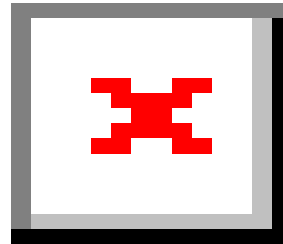
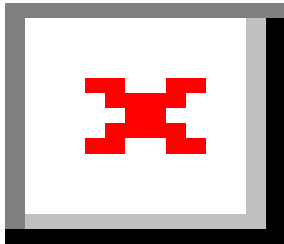
Table s1.1 states that all glass, ferrous and non-ferrous metals arising from the treatment of end of life vehicles shall be stored on hardstanding or an impermeable surface with sealed drainage system. All other wastes shall be stored on an impermeable surface with sealed drainage system.

There is a large pile of tyres stored on unmade ground on a bank to the south east of the site. Waste tyres

must be stored on an impermeable surface with a sealed drainage system. Please ensure these are stored correctly or removed from site. There are also car shells being stored on unmade ground which is not in line with this condition. We understand you have made a start on this which we were pleased to see. There is also scrap metal spilling off the concreted area onto unmade ground.

Action: Please see compliance notice.

Photographs visit



EPR Compliance Assessment Report

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Operator/Permit holder	Heads Of The Valley Salvage Limited	Date	27/03/2017

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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	C3	See compliance notice	26/10/2017
E3	C3	See compliance notice	25/05/2017
C2	C3	See compliance notice	25/05/2017

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.