

Compliance Assessment Report

Report ID:
CAR_NRW0032536

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

Site	Diggers Dismantlers	Permit Ref	ZP3295FH		
Operator/Permit holder	William David Roberts				
Regime	Waste Operations				
Date of assessment	24/11/2017	Time in	13:30	Out	13:50
Assessment type	Site Inspection				
Parts of the permit assessed	Management & infrastructure				
Lead officer's name	Dearle, Nessa				
Accompanied by	Magda Leonowicz				
Recipient's name/position	Mr William Roberts/ Site operator	Date issued	29/11/2017		

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
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3	Table 3.1 c)
C3 - General Management - Materials acceptance	A	
D1 - Incident Management - Site security	A	
E2 - Emissions - Land and groundwater	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

On the 24th of November 2017 environment officer Nessa Dearle and permitting officer Magda Leonowicz completed a site inspection to assess compliance with the environmental permit. The weather was cold and dry at the time of inspection and waste was not being accepted on site.

Thank you for taking the time to show us around site. I was satisfied to see that the problems with oil spills that were recorded in the last CAR form had improved. Minimal oil spills were seen on site and evidence of spill kit use could be seen. A quarantine area has also been put in place for the WEEE that has been incorrectly left on site. While on site you discussed an interest in having an exemption for storing WEEE on site to accommodate non-permitted wastes that get left on site outside of operational hours. I will send details on these exemptions and how to apply to your site.

Some minor issues were detected on site; these are outlined in the relevant breaches and advice and guidance below.

Breaches

B3) Site Drainage engineering (Clean and foul)

Table 3.1, c) of your permit outlines that "sealed sumps shall be inspected no less frequently than daily and after rain, emptied when the collected liquids reach 80% of the capacity of the sump as measured using a dipstick or equivalent gauge".

As outlined in the previous CAR form, the interceptor was again not accessible at the time of inspection. Several car parts were covering the interceptor and it was clear that the interceptor had not been inspected in some time. Access to the interceptor is required to ensure that regular inspections can be made and that the interceptor is emptied when required.

Action: As discussed on site, the car parts that are currently covering access to the interceptor need to be removed within a week of our site visit. A follow up visit will be completed on the 1st of November to

inspect the interceptor.

Notes

While on site we discussed the technically competent management requirements for your permit. We discussed the potential to hire a WAMITAB holder qualified in end of life vehicle technical competence to visit the site, to fulfil your permit requirement. I was pleased to hear that Robert Lorry has been visiting the site weekly as technically competent management. Regular site attendance will need to be confirmed with Robert. Your waste permit also requires technically competent management attendance to be recorded in a site diary. Please ensure that Robert Lorry signs a site diary to ensure that all his visits to site are correctly recorded. If you have any queries relating to this form or your permit, please get in contact on the details below.

Nessa Dearle

Tel: 03000653352

Email: nessa.dearle@naturalresourceswales.gov.uk

EPR Compliance Assessment Report

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CAR_NRW0032536**

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Site	Diggers Dismantlers	Permit Ref	ZP3295FH
Operator/Permit holder	William David Roberts	Date	24/11/2017

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			
B3	C3	As discussed on site the car parts covering access to the interceptor need to be removed within a week of our site visit. A follow up visit will be completed on the 1st of November to inspect the interceptor.	01/12/2017

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.