

	EPR Compliance Assessment Report	Report ID: 30359/0196651			
This form will report compliance with your permit as determined by an NRW officer					
Site	Twyn Dismantlers Ltd		Permit Ref	30359	
Operator/ Permit holder	Griffiths Caleb				
Date	19/12/2013		Time in	11:15	Out 12:10
What parts of the permit were assessed	Storage and infrastructure				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op X	Water Discharge
Recipient's name/position	Ashley Griffiths / TCM				
Officer's name	Ella Williams		Date issued	23/12/2013	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	C3	3.1.2;
	4. Containment of stored materials	C3	3.1.1;
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	C3	5.4(a); 3.1(f);
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	NA	
	5. Waste	NA	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	NA	
	2. Energy	NA	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	12
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

ELVs on impermeable surface not served by sealed drainage Category 3 breach of condition Table 3.1(c) of licence – scored under B4 (Infrastructure – Containment of stored materials) The area to the north of the site has a concrete surface where vehicles are stored. When I walked around this area I saw vehicles that still had battery on and others that said "drained" on them. I am therefore not confident that only de-polluted vehicles are being stored here, and it appeared that Ashley was unsure also. Thank you for providing a drainage plan of the site to me. This identified this area as not served by the interceptor, and therefore you cannot store vehicles that aren't fully de-polluted in this area. Action: By 31st March 2014 you are required to comply with this condition. You have a couple of options in order for this area to comply with your licence, these are (but not limited to): • Only store fully de-polluted vehicles in this area • Only store vehicles for resale that are not to be broken in this area • Construct a kerbed sill so that if un-depolluted ELV's are stored it is captured and drains into the sealed drainage system rather than into the area of hardstanding. Please let me know your intentions with regards to this area, and treat addressing this issue as a priority. If you intend to re-engineer the site then please contact me to re-arrange the date for compliance as this is likely to take longer. During the visit there was no run-off such as oil spills from this area, however should any subsequent visits highlight such issues, this timescale may be shortened. Labelling and storage Category 3 breach of condition Table 5.4(a)(i) and 3.1(f) of licence – scored under C4 (Management - Storage, Handling, Labelling & Segregation) Thank you for labelling the waste oil containers as requested on my last visit. However. There did not appear to be a designated area for other fluids such as brake fluid etc. There was a container in the garage that you thought might be the container. It was not labelled and it was not in a bunded area. Action: By 31st March 2014 Please ensure all containers containing fluids are appropriately labelled so that staff know where to drain fluids into and ensure that they are stored in a bunded area. Broken drainage channel Category 3 breach of condition 3.1.2 of licence – scored under B3 On my last CAR form I mentioned that there was evidence that the drainage channel was starting to become damaged again (photo 1) and that you needed to ensure maintenance of this so that it do not become a breach. However, it is now broken (photo 2) and has therefore been breached against your licence. Photo 1: 18th September 2013 inspection Photo 2: 19th December 2013 inspection It was mentioned during the visit that it was to be repaired but this had been postponed due to the contractor you were to use said he needed dry weather. As there was no site diary available to verify that this maintenance had been schedule and due to the previous advice as been breached Action: Repair drainage channel by 31st March 2014 Site Diary Condition 6.2.1 of your licence states that a site diary shall be available for inspection at the site when required by us. During my visit it was not available as you had accidentally left it at home. Action: You have not been breached for this on this occasion due to the interceptor checks I was looking for being held in a separate folder which was available, however I will expect to see it on my future visits otherwise this may result in a breach. The site diary shall include a record of the following events: • Construction work • Maintenance • Breakdowns • Emergencies • Problems with waste received and action taken • Technically competent management attendance on site: the date and time onto site and the time left • Complaints about site operations and actions taken • Environmental problems and remedial actions Interceptor inspections Thank you for providing me with a copy of your inspection log sheet for the interceptor tank and soakaway. Access to the areas was difficult and you said you had to remove waste in order to inspect ever week. Action: I advise you train staff not to leave material in this area and have a housekeeping schedule in order to keep the area

tidy. Vehicles on hardstanding There were 4 vehicles that had not been de-polluted that were sat on the hardstanding area. I did not consider these to be End of Life Vehicles and appeared to be in good enough condition to be repaired rather than broken. And can therefore be stored here. You informed me that they were indeed to be repaired and were being stored here due to lack of space. Action: Ensure that the site is managed so that you are not accepting more vehicles that you have space for. If you do need to store vehicles for re-sale in other areas, ensure they are labelled so as to be distinguishable for vehicles that are to be broken or have been broken.

Waste on edge of river bank Material and waste from your site was being stored right on the edge of the bank of the River Rhymney. Action: I advise you keep a buffer at the edge of your site along the river to avoid this material entering the river and causing an offence. Pollution prevention guidance available from <https://brand.environment-agency.gov.uk/mb/C7CI42> suggests a 10m buffer. Waste Returns Action: As discussed, your annual waste returns are due by Jan 31st 2014. They need to cover the previous year (Jan 2013 - Dec 2013). The Environment Agency are still providing this service on behalf of Natural Resources Wales. Information and how to submit the returns is available from: <http://www.environment-agency.gov.uk/business/topics/waste/121942.aspx> TCM Ashley Griffiths is the current TCM for site and is registered to sit his continuing competency in January 2014. This is in line with the requirements of your current qualification. Action: Please forward me a copy of your continuing competency certificate once completed and received

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Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	
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.	X
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
B3	C3	Repair drainage channel	31/03/14
B4	C3	Store ELVS on ground that is served by sealed drainage system	31/03/14
C4	C3	Label all containers for residual fluids and store in bunded area	31/03/14

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 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 which 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 fulfill 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 (e.g. 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 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 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 twenty 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 the officer's line managers. 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.