

Compliance Assessment Report

Report ID:
CAR_NRW0034670

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

Site	Sensient Flavors Ltd	Permit Ref	BL5644IK			
Operator/Permit holder	Sensient Flavors Ltd					
Regime	Installations					
Date of assessment	25/09/2018	Time in	10:30	Out	15:30	
Assessment type	Audit					
Parts of the permit assessed	See Agenda					
Lead officer's name	Jenkins, Nicholas					
Accompanied by	Cowie, Douglas					
Recipient's name/position	Tim Pink/ EHS Manager	Date issued	08/03/2019			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3	3.3.2(b)

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

Attendees

Andrew Morgan (Sensient Flavors Ltd) Engineering Manager

Tim Pink (Sensient Flavors Ltd) H&S Manager

Nick Jenkins (Natural Resources Wales) PPC Officer

Douglas Cowie (Natural Resources Wales) PPC Officer

Agenda

NRW's regulatory focus will continue to be on air emissions from the installation namely A6 (Drytec dryer) and A7 (EVA dryer) and discussion of the following:

1. A detailed description of each dryer, including but not limited to:

- Abatement technology
- Emissions monitoring programme
- Maintenance and cleaning schedules
- Training records of responsible staff

1. Progress with Improvement Condition 9.23 and Improvement Condition 9.24
2. Update on noise management plan
3. Sensient's response to incidents
4. BRef Update

Background

We have been working with Sensient to consider its emission points that have the highest potential to create offsite odours. The present work programme commenced in 2014 with the Operator contracting the

expertise of Odornet who were tasked to analyse Sensient's potential to emit odours from seven of its main stacks. Of the seven stacks and associated scrubber units, Odornet considered the odour removal effectiveness of A4 (MCPD) and A5 (Alderley) was 'well below expected levels'. By 2017 Sensient installed, commissioned and is now operating two replacement scrubbing units and emission stacks for A4 and A5. These improvements have seen a marked reduction in the permitted levels for Volatile Organic Compounds (VOCs) and particulates.

Although contributing to the works odour emissions i.e. 9.1% and 18.2% (respectively) A4 and A5 were not the main odour contributors according to the Odornet report. The primary contributors were identified as A6 and A7 (drying systems), 52% and 14.6% respectively. These dryers have separate scrubbing systems but operate in largely the same way i.e. spray tower scrubbers.

Sensient recognises that:

- the effectiveness of abatement systems is dependent upon the reliability and effectiveness of the operation of the scrubbers and;
- a scrubber with variable performance cannot be guaranteed to achieve the required standards.

1. Overview of Emission Point A6

The following descriptions have been taken from Sensient's application for its permit including associated improvement conditions but also information was gathered on the day.

Sensient has two large spray dryers for the drying of Hydrolysed Vegetable Protein (HVP) and yeast suspensions. The A6 Drytec and the A7 EVA dryer are very similar in design, although the size and ultimately the production rates are different.

A6 Drytec Dryer – This is designed as a counter current tower dryer with an atomiser used to dry HVP. It operates at around 600kg/hr output and will frequently run continuously for several days on either a single product or similar product. Once the HVP is passed through the counter current tower dryer, it is delivered to the cyclone system which separates the powder and air stream via a particulate disentrainment system. The powder is dropped out of this stage for further processing while the air stream is diverted to a bag filter system. The Relco RWD 68 bag filtration system installed in 2012, was specifically designed to treat the exhaust air directly from the spray dryer. The system is around 25 years old.

A6 Drytec Scrubber – Exhaust from the Drytec dryer cyclones is passed to the bag filter system before being blown into the Drytec scrubber. The scrubber incorporates a spray bat and a Venturi device to entrain the scrubbing liquor into the bag filter exhaust, with the liquor (dilute sodium Hypochlorite which controls the Oxidation Reduction Potential) being pumped into the air stream. The liquor is recovered from the air stream using a cyclonic separator fitted with a demister. The exhaust passes through a final cyclonic separator before reaching the main dryer fan. This fan is drawing air at 90°C at a rate of 4,500 m³ creating the vacuum through-out the dryer system. The fan discharges cleaned gases through the dryer

stack to atmosphere at around 38,000m³/hr.

The temperature of the process decreases as the product passes through each stage. Primary stage water from the Wanson boiler is approximately 200°C; the temperature of the dryer chamber is around 100°C and finally around 44°C within the scrubbing system.

The sump liquor is automatically dumped to the onsite effluent plant for 15 seconds every 20 minutes (30 seconds every 25 minutes as advised in the application) to “prevent heat build-up in the scrubber liquor”. The dumping is controlled by the dryer's Programmable Logic Controller (PLC) but the optimum settings have been developed from historical evidence of operating the system.

Antifoam is added directly to the Sodium hydroxide break tank to prevent foam generation in the scrubber. Scrubber liquor is replenished automatically, and water feed is in bled manually during daily visual assessments of the colouration of the liquor. This manual method of feed water is down to experience of the operator and not in accordance with any standard.

The scrubber activity is displayed on the Human Management Interface (HMI) located close to the operator of the A6 system. This is a local display and telemetry is not currently run through a central control room.

Scrubber liquor flow is monitored, and a lack of flow shuts down the dryer. Low flow is audibly alarmed and Sensient confirmed that there is no indication of the pH during this process, as the ability to measure was removed approximately 15 years ago.

The A6 Drytec system is automatically washed at the end of a cycle using Cleaning in Place (CIP) system.

The scrubber efficiency is controlled via ORP via a conductivity probe within the scrubber media. ORP is used to determine the complete exhaustion of a particular chemical but is not recommended as a means to determine concentration of the scrubbing solution or its by-products.

Overview of Emission Point A7

A7 is the **EVA spray dryer** which has been designed to dry a variety of seasonings and flavours using an atomiser within the unit. Its production is optimised at around 150kg/hr and Sensient advised that A7 operates on a batch cycle of around 5-8 hours and operates on average 9 days/month. This process is reflected in its contribution to the overall works odour i.e. 14.6%. Between batches, the dryer is washed manually to minimise contamination.

The EVA dryer was constructed in-house based on the A6 model and as such many of the stages are replicated, except the bag filtration system. The EVA has only one 'fines' cyclone which is larger than each single Drytec 'fines' cyclone chamber. The main dryer fan is positioned before the wet particle scrubber and routinely operates at about 70% of the A6 Drytec fan speed. Washdown waters from the EVA and

Drytec spray dryers and associated equipment are fed to the onsite effluent plant. Atmospheric releases are of dust and odour from the main dryer stacks and combustion gases from the Wanson boilers.

A7 EVA spray dryer scrubber - The EVA dryer exhaust is vented through the EVA scrubber. The scrubbing liquor is sprayed into exhaust air stream using two spray balls and a Venturi device. The liquor is recovered from the exhaust in a cyclonic separator fitted with a demister. The scrubber sump is automatically dumped for 20 seconds every 20 minutes (this is controlled by the dryer's PLC). Dumping prevents heat build-up in the sump liquor. An antifoam agent is charged directly to the scrubber's sump to reduce foaming.

Chemical scrubbing control considerations

pH Control is often chosen for scrubbers using continuous blowdown and replenishment. Acidic gas scrubbing, such as hydrochloric acid (HCl), is controlled by maintaining an excess concentration of a basic scrubbing chemical, such as caustic (NaOH) or lime (Ca(OH)₂). pH is specific to hydrogen ion (H⁺) concentration, which is related to the concentration of the basic scrubbing chemical. This specificity allows pH to be used as a key parameter to control scrubbing with minimal effects from scrubber by-products (unlike conductivity, which is nonspecific and will be influenced by by-products).

ORP (Oxidation Reduction Potential) measurements may also be used in conjunction with pH measurement if the scrubbing reaction involves an oxidation or reduction change. ORP monitoring can only be used to determine the complete exhaustion of a particular chemical and is not recommended as a means to determine concentration of scrubbing solution or by-products.

Conductivity is best suited to measure scrubber solution concentration in batch scrubbers. Conductivity is non-specific and will respond to both conductive scrubbing chemicals and by-products. As the scrubbing chemical is depleted, its contribution to the scrubber solution conductivity will decrease. While the chemical concentration is being depleted, the by-products are building up and their contribution to the total conductivity is increasing.

If a measurable decrease in conductivity is detected as the scrubbing solution is depleted, then the scrubbing chemical concentration can be measured. One example of this is batch scrubbing of chlorine gas (Cl₂) using strong caustic (10-15% NaOH).

If more than one gas is being scrubbed, difficulties can arise which adversely impact on scrubber performance. Depending on the relative proportions of the gases, the by-products formed will differ, leading to variations in the conductivity background. Deriving concentration from conductivity can be difficult, although a conductivity measurement may still provide an alarm point to alert the operator to check a spot sample.

Although conductivity is used most often for control in batch scrubbers, it can also be used to initiate blowdown to prevent a build-up of dissolved solids in continuous replacement scrubbers.

Recommendation(s) – The following points have been raised considering the review of the information above and the detail provided by Sensient during the audit. Some of these points were not clarified on the day and are essential to understand the operation of A6 and A7 scrubbers. We now require Sensient to provide sufficient information for each of the following points by the end of March 2019.

- The contacting power required for effective scrubber operation is obtained from an appropriate combination of liquid pressure and flow rate. How does Sensient measure these parameters and how does it trend the correlation between the two? If it does not measure these, please could it provide an indication as to why not.
- Physical absorption during the scrubbing phase depends on properties of the gas stream and liquid solvent, such as density and viscosity, as well as specific characteristics of the pollutant(s) in the gas and the liquid stream (e.g. diffusivity, equilibrium solubility). How does Sensient measure the properties of the gas stream and the liquid solvent for the parameters outlined above? If it does not measure these, please could it provide an indication as to why not.
- Density; viscosity; diffusivity, equilibrium solubility are temperature dependent, and lower temperatures generally favour absorption of gases by the solvent. How does Sensient measure the temperature and trend the relationship between absorption and temperature? If it does not measure these, please could it provide an indication as to why not.
- Absorption is also enhanced by greater contacting surface, higher liquid gas ratios, and higher concentrations in the gas stream. Does Sensient monitor these three parameters if so, does it correlate how these three interact with the effectiveness of the scrubbing systems? If it does not measure these, please could it provide an indication as to why not.
- The literature provided for the Relco RWD 68 bag filtration system on A6 states that it is designed to treat direct gases but instead the filter takes gas after it has been processed in the cyclone. How has Sensient managed this change?
- Within the information submitted subsequently to Sensient's permit (Improvement Condition 9.7) Sensient specified that due to the hygroscopic nature of the product a bag house filter device is not appropriate. Sensient will need to clarify why a bag filter was installed based on the statement produced.
- Antifoam is used in the process, but we are unclear as to what product Sensient is using. Please could Sensient provide a detailed description of what is being used.
- We were informed that scrubber liquor flow is monitored, and a lack of flow shuts down the dryer, but we are not clear as to whether this is automatic or a manual operation. Please confirm.
- The opportunity to measure pH may have provided an additional gauge on the effectiveness of oxidation within the scrubber. Sensient removed this probe around 15 years ago but it is not clear why this was done or whether any management of change process (MoC) was instigated to assess the probe removal. Please could Sensient advise whether a MoC was developed and if so, provide it. If not, please state the reasons for the removal of the pH probes.
- Sensient advised that the sump liquor is automatically dumped to the onsite effluent plant to "prevent heat build-up in the scrubber liquor". Please could Sensient clarify whether the dumping is critical to the concentration of the solution or the heat build-up?

Maintenance & Monitoring

Redox monitoring probes are checked daily but are not calibrated to a standard or included on the operator's PPM schedule. The operator instead uses experience and relies on the values produced by the meter and when they are reading negative values, it is removed and cleaned. The probes across the installation are universal (ProMinent RHEX PT SE) and according to the manufactures guidelines operate within set limits i.e. temperature and pressure but are required to provide data for conductivity above 500 $\mu\text{S}/\text{cm}$ and a Redox potential in the range of $-1000 + 1000\text{mV}$. It is not to be used in media containing chlorine/fluoride and conditions with frequent temperature fluctuations.

Spares are kept on site and we were shown the engineering workshop where multiple probes are stored. Contractors are used for large scale repairs while smaller, manageable engineering tasks are completed in house. Sensient have a team of in-house fabricators but also keep a large supply of essential spares.

Recommendation – Based on the information above regarding the frequent temperature fluctuations, please could Sensient clarify whether the use of the probes would be suitable in its batch processes associated with A7 by the end of March 2019.

Evening & Weekend Shift Check Sheet

All the onsite scrubbers are inspected daily by the shift engineers, using a detailed shift check sheet. Any urgent issues are fixed immediately otherwise a job card is raised and placed on the system to be resolved. We were provided with an example sheet (06/10/18) which was undertaken by 'John'. It covers 46 areas of the installation and includes the Drytec and EVA dryers and the associated scrubber systems. Four checks are made of the Drytec scrubber and six are made of the EVA scrubber:

A6 Drytec Inspection Checks	A7 Eva Inspection Checks
Check operation of dosing pumps	Check for water leaks
Check probes are clean	Check for chemical dosing line leaks, bleed if needed
Check water flow and record what scrubber pump is running	Check operation of dosing pumps 108-450-003 & 004
Redox/ORP Controller 80-250mV	Redox/ORP Controller 160-230mV
	Check if scrubber pump is running 108-450-001
	Check level of Hypochlorite

Additional checks are made of the:

- Drytec bag filter – A range of values are provided in the template for expected efficient operation, but it is unclear whether these values are acceptable and the source of these ranges.
- Drytec and EVA main and transport fans.

On an eight week cycle the Drytec and EVA scrubbers are more closely inspected and Sensient provided a sample of two verification sheet for weeks 32 and 29 respectively. These were completed by John and Anthony and reviewed and signed by ??? The signature is not clear.

Recommendation – Sensient to clarify why the range of values used in assessment of the bag filter are appropriate and where these values have been sourced. Please could we receive this by the end of

March 2019.

Training Records

Andrew Morgan (Engineering Manager) has been employed by Sensient for over 21 years and provides the engineering experience of which Sensient requires to operate an installation in an almost rural location. He has a team of eight “skilled engineers” who are trained internally by Andrew. These will include general toolbox talks but also some general training. Training is logged within a matrix, but no refresher dates are outlined. Some records date back to 2007 with no additional completion dates provided but there is no specific training associated with pollution control. Sensient advised that it also has a ‘buddy up’ approach to disseminating information from experienced staff but we were advised that this is not recorded.

There appears to be a reliance on Andrew and his knowledge of the Felinfach installation as the developer of some of the critical parts of the processes at the installation. Although we had the impression that Andrew is unlikely to leave, the resilience of the engineering team may be compromised if Andrew was to leave the company.

The Health and Safety manager has a diploma in Environment management from NEBOSH and is the conduit between the engineering team and the regulatory team of NRW.

Recommendation - Sensient to review how it can record the transfer of information generated during the buddy up approach. This can be discussed at the next opportunity.

1. Progress with Improvement Conditions 9.23 and 9.24 (IC 9.23 and IC9.24)

In July 2017, Sensient submitted its reports associated with the requirements of IC 9.23 and IC 9.24. The reports were reviewed, and a response was provided 9 October 2017 which identified the low number of data points that were used in the production of the report. Going forward, we expected Sensient to review the report at the end of 2018 once the full data set for 2017 and 2018 are available. This would inevitably increase the confidence of the data and provide more robust emission limits for the ICs and the permit.

Action – Sensient to review IC 9.23 and IC9.24 to include the 2017 and 2018 data and resubmit the reports as required by the permit by end of April 2019.

1. Update on noise management plan (NMP)

In February 2018, we issued a CAR form (Ref CAR_NRW0033016) that discussed an investigation that we had undertaken to identify the source of a sound impacting upon a resident residing close the Felinfach industrial estate. As an action on Sensient we required the operator to review its existing noise management plan (NMP) (dated 10 May 2006) that would reflect the current onsite plant and machinery.

The expectation was that it would use existing guidance for noise produced by the Environment Agency – Horizontal Guidance H3 Part 2 – Noise Assessment and Control (H3). Appendix 4 of guidance note H3 specifically deals with how to create a NMP. We also required Sensient to include an analysis of tones generated by each plant and machinery at the installation and we advised that this work would be best suited to a professional with relevant experience and qualifications.

In November 2018, Sensient submitted its review of the NMP. The report is largely based around the model outlined in H3, but this CAR form is **not** a review of the NMP, it is mainly a check against the action in CAR_NRW0033016.

The report omits the specific tonality required to identify each Sensient sound source. This was outlined in the CAR and will be expected to be completed.

During our site tour we subjectively identified a possible source of sound that was consistent with the sound we had analysed during the offsite monitoring. This onsite source was described as A23 blender bagging LEV.

We requested Sensient to consider undertaking an assessment in collaboration with the complainant to switch on/off the source so that any changes in the sound were corroborated with the complainant. This was not taken on-board by Sensient and instead it carried out an onsite assessment and developed its own methods for attenuating the sound. We have asked for details of the work, but this has not been submitted.

Action – Sensient to carry out further assessment of its sound sources to identify whether there are any tonal aspects associated with its operation and to identify such tones using single octave/narrow band analysis.

Action – Sensient to provide evidence including any reports, that it has measured the sound pressure levels and tones from A23 and has developed a tailored approach to deal with any identified tones and excess sound. We also expect a review of the attenuation following its implementation that includes any reduction in sound pressure level and tonality using appropriate methodologies and measurement equipment. Both of the actions under this section are expected to be submitted before the end of April 2019.

1. Sensient's response to incidents

It was acknowledged that Sensient will improve its response to incidents as the months leading up to the audit, several incidents did not receive an official response. We discussed the reasons behind the failure to respond and although we accept some of the reasons, it is a requirement of the permit to respond in line with the procedures outlined in its odour management plan (OMP). We have sent the operator several reports and a response was provided 6 December 2018. These are currently being reviewed.

Sensient's OMP outlines that reports of odour will be promptly investigated. Sensient has failed to respond promptly to the reports in line with permit condition 3.3.2(b) and will attract a non-compliance score.

Sensient advised that it has reviewed its procedures and responses to incidents.

SCORE 3 – Breach of permit condition 3.3.2(b) – No response to odour incidents which is a requirement of Sensient’s Odour Management Plan.

1. BRef update

The Environmental Permitting Regulations 2016 (EPR) as amended were written in a manner that require the regulating agency to reconsider and update all Part A permits following the publication of the Best Available Techniques Reference document (BRef) for that sector, in accordance with Article 21 of the Industrial Emissions Directive “the directive”.

Paragraph 4 of article 21 of the directive states that where an installation is not covered by any of the BAT conclusions then the permit conditions shall be reconsidered and, if necessary, updated where developments in BAT allows for significant reduction of emissions.

The BAT conclusion documents all have a section that explains the scope of the document, this scope does not include those activities retained in the EPR regulations for Wales and England and therefore these activities are not covered by any of the BAT conclusions. Therefore, the BAT Conclusions and associated emission levels do not apply in the same manner as the activities listed in Annex I of the directive.

How will we deal with Part A installation not listed in Annex I of the directive?

We will:

1. Consider the permits for Part A installations not listed in IED following the publication of the relevant BRef document;
2. Introduce an improvement condition into the permit requiring the operator to assess their installation against the new BAT conclusions;
3. Require the operator to comply with the new standards where the standards will result in a significant reduction of emissions;
4. Review the permit within 4 years of the BAT conclusions being published.

The timescales for operator compliance will be dependent on the scale of the reduction in emissions and the proportionality of the costs to the benefits gained.

How will this affect Sensient?

Sensient Felinfach is not a listed installation under IED however, the operations are permitted under section S4.2 A (1) (b) of Schedule 1 of EPR i.e. a manufacturing activity which is likely to result in the release into the air of any hydrogen halide. It is considered an inorganic activity under EPR but the activity of producing flavours and fragrances is captured under the organic BRef. The operation is also considered under the Food, Drink and Milk (F&D) BRef but as a secondary activity.

NRW is aware of this scenario and has raised this through its chemical sector and discussions with the group have provided clarity on the way forward:

Sensient primary activity will be considered during the review of all relevant chemical BRefs. Where significant reductions in emissions can be achieved and an assessment of the costs against the benefit will be gained, these will be expected to be implemented within the 4-year window. No formal review of the permit will be undertaken of the F&D BATcs if the F&D BRef is published before the Chemical BRefs.

[END]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034670**

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

Site	Sensient Flavors Ltd	Permit Ref	BL5644IK
Operator/Permit holder	Sensient Flavors Ltd	Date	25/09/2018

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			
G4	C3	Sensient to improve its procedures to ensure that all incidents raised, either locally e.g. from residents; by NRW or other regulatory bodies are investigated promptly.	31/03/2019
B1	X	Further information is required to understand how Sensient controls its emissions from its scrubbing units of A6 and A7	31/03/2019

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.