

	EPR Compliance Assessment Report	Report ID: 5265
This form will report compliance with your permit as determined by an NRW officer		
Site	Llysonnen Mill	Permit Ref EP3034GS
Operator/ Permit holder	Wynnstay Group PLC	
Date	24 September 2013	Time in 10:00 Out 12:30
What parts of the permit were assessed	See Below	
Assessment	Choose an item.	EPR Activity: Installation ☒ X Waste Op ☐ Water Discharge ☐
Recipient's name/position	Huw James / Mill Manager	
Officer's name	Karen Dunn	Date issued 6 Nov 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	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	3	3.5.4
	2. Records of activity, site diary, journal & events	3	2.3.1
	3. Maintenance records	N	
	4. Reporting & notification	4	4.2.3
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

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

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	8.1
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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

Cyfoeth Naturiol Cymru / Natural resources Wales

As of 1 April 2013, the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales became Natural Resources Wales/Cyfoeth Naturiol Cymru
www.cyfoethnaturiolcymru.gov.uk

Please be advised of the following contact details in the new organisation:

PPC Team e-mail inbox: industryregulation.swwales@cyfoethnaturiol.cymru

Customer Contact Number : 0300 065 3000

Incident Hotline Number: 0800 80 70 60

Introductions:

Wynnstay representatives present during this audit were:

Richard Flack (RF) – Nutrition and Production Manager
Huw James (HJ) – Mill and Site Manager
Sandra Cipollaro (SC) – Health and Safety Co-ordinator

Since the last visit Wynne Lewis has left the company and Huw James has joined as Mill and Site Manager of the Llysonnen Mill. This was a pre-arranged visit and an agenda was provided just prior to the audit. The main aim of the visit was to meet with the new mill manager and to assess progress on the site improvements to address fugitive emissions and discharges to controlled waters.

The following areas were visited during this audit:

Current status of the Environment Management System (EMS) for the Llysonnen Mill
Monitoring and reporting
Actions in the last monitoring and visit reporting forms
Dust complaints
Matters arising

Objective 1: To establish the status of the Environment Management System (EMS) and associated procedures as referenced in the permit application for the Llysonnen mill.

At the last visit in September 2012 the regulator was advised that an EMS had been developed and was in draft for the Llysonnen mill. Since the visit the operator has sought advice on the draft. An EMS is yet to implement at the Llysonnen mill. Once implemented the operator aims to seek accreditation.

Action: Operator to provide a timeline for the implementation of an EMS and associated procedures at the Llysonnen Mill.

Objective 2: To review the monitoring and reporting requirements with the operator and to audit against the actions placed on previous CAR forms.

The operator continues to incur easily avoidable non-compliances relating to the monitoring and reporting requirements of the environmental permit and this has been raised previously.

In May 2012 KD provided comments (CAR 4581) on a procedure that had been developed by Excal Ltd on behalf of Wynnstay Group PLC. The procedure was entitled :

- Operator Monitoring Protocol March 2012 Report No. 129-01-06.R1

It was understood that this procedure had been implemented at the Llysonnen mill and would form part of the EMS. As a result of non-compliances actions had been placed on the operator to review their procedures to prevent a re-occurrence. A request was made by the inspector for a copy of the review of the monitoring protocol however this had not been carried out.

The operator has failed to respond to the actions placed on the compliance assessment report (CAR) forms. A request was made by the operator during this audit to consolidate the actions from previous reports on this assessment form. KD agreed to do this on this occasion due to the number of staff changes that have taken place since the permit was issued (Tables 1, 2 and 3 below). It is important actions placed on the operator are addressed and responded to in a timely manner and they are not left for open discussion at the next audit. It is also important that the CAR forms are read and acted upon to ensure that the issues raised by the regulator are addressed to prevent a repeat of the non-compliance and an escalation of the action taken by NRW.

Objective 3: To review of Quarterly Monitoring Submission for period of 1 April – 30 June 2013

On 5 August 2013 the operator submitted a quarterly monitoring return for the period commencing 1 April 2013 to 30 June 2013. The submission was due on 28 July 2013 so a category 4 non-compliance of the permit has been incurred. The correct reporting form was used however the date and times the discharge was sampled states January February and March for the April to June results this has also incurred a category 4 non-compliance score. The suspended solids result for June had been entered as 89.2 but no units have been included. The emission limit value for suspended solids at discharge point W1 is 15mg/l. In order to complete the review of this return it needs to be re-submitted inclusive of the units. Please submit any electronic correspondence relating to permit conditions or a notifiable incident to the PPC team email address: industryregulation.swwales@cyfoethnaturiolcymru.gov.uk and copied to your site officer KD.

Action: Operator to re-submit the quarterly monitoring return for 1 April to 30 June 2013 with the correct sample times and dates and inclusive of the units on the results.

During the write up of this audit the operator has submitted a quarterly report form for 1 July – 30 September 2013. The assessment of this submission has been included on this CAR. The submission was made on time and on the correct reporting form. The date and time of when the samples were taken were in January, February and March 2013 which has incurred a category 4 non-compliance score.

Action: Operator to re-submit the quarterly monitoring return for 1 July to 30 September 2013 with the correct sample times and dates and inclusive of the units on the results.

Objective 4: To review the actions on the last visit report form with the operator Compliance Assessment Report ID 4807.

Please see objective 2 regarding operator response to actions placed on CAR forms. A brief review was undertaken with the operator over the actions placed on Report ID 4807. It was clear from the review that some of the actions and recommendations placed in the report had been progressed since the last audit and this was evident on site (see Site Observations) however the actions hadn't been responded to and the majority were still on-going. In report ID 4807 the actions from the previous CAR 4304 had been reviewed so these have also been replicated below because some of them are still active.

Table 1

<u>Reference</u>	<u>Actions in Report ID 4304</u>	<u>Status</u>
1/221112	Operator to review EA Technical Guidance Note (monitoring) M18 to ensure that a representative sample is taken at W1.	On-going work regarding W1
2/221112	Operating procedures should be in place to fulfil the requirements of the environmental permit and should be made available for future EA audits of the installation	Ongoing Environment Management System (EMS) in draft
3/221112	Operator to review the wording of the improvement conditions against the submissions already made and provide the outstanding information required namely timescales, inspection and maintenance programme.	On-going
4/221112	Operator to notify on completion of the sealing of the overflows on the septic tanks.	Update provided during visit of 21/9/12
5/221112	Operator to review the reports already submitted to the EA against the wording of the improvement conditions e.g. assessment against PPG2	On-going

Table 2

<u>Reference</u>	<u>Actions / Recommendations in Report ID 4807</u>	<u>Status</u>
1/210912	Recommendation: Operator to review the incident procedure alongside the reporting requirements of the environmental permit for their inclusion in the EMS.	This had not been undertaken. On-going
2/210912	Action: Operator to respond to National Incident Recording System notifications (NIRS) in a timely manner. If investigations are on-going an update can be provided however feedback on operations and any assessments made against a fugitive emissions / incident management plan linked to the onsite EMS is required to complete the NIRS.	Since this audit the operator has responded to NIRS notifications. This needs to continue in the event of a complaint. Closed
3/210912	Action: Operator to provide a copy of the fugitive emissions management plan for the site (please refer to permit condition 3.2.2).	This has not been undertaken. On-going
4/210912	Action: Operator to inform the site inspection of the change to the extraction on the raw delivery bay.	A verbal update was provided by the new mill manager prior to this visit. Superseded
5/210912	Recommendation: We recommend that the operator considers quantifying any dust deposited outside the installation boundary as part of their investigations into this on-going issue.	Recommendation currently on hold following a change to the extraction system on the raw delivery bay.
6/210912	Recommendation: The operator may wish to consider colouring coding the manholes /drains to denote foul from clean surface water.	This has been adopted in part on the site. Drainage works currently On-going

7/210912	Action: Operator to e-mail KD when the second cesspit overflow that serves the site offices has been sealed.	No e-mail received.
8/210912	Recommendation : Operator to consider the need to place local signage in the yard to remind drivers to brush down their vehicles before leaving the site	Yard changes currently On-going

Objective 5: To discuss the number of dust complaints received in respect of the Llysonnen mill and the abatement systems in place to prevent fugitive emissions.

From the date of the last visit on 21 September 2012 Natural Resources Wales (NRW) and the Former Environment Agency Wales (EAW) has received 23 complaints of dust concerning the mill. The last complaint was received on 1 June 2013 with no complaints in July, August or to date in November 2013. The operator was asked why they considered the complaints had stopped.

HJ explained that the procedures on the raw material intake and the extraction system had been improved since the last audit. It was considered that these improvements may have impacted on the potential for fugitive emissions from the mill. KD enquired about the replacement of the torn curtain on the intake and was advised that this had been replaced (please see observations). RF stated that he had visited a local resident to discuss the dust issue and explained that vehicle movements had increased at the mill from the previous owner.

The following table 2.1 below has been replicated for ease of reference from the application document linked to the environmental permit. KD enquired over a procedure for the maintenance of the abatement systems on site to prevent fugitive emissions. The operator was unable to demonstrate the frequency of the maintenance for the abatement systems or the visual assessments that are recorded on a daily basis. This is a breach of the environmental permit and the agreed operating techniques under condition 2.3.1 and has incurred a Category 3 score on this CAR

Action: Operator to include the maintenance requirements of the abatement systems in the EMS for the prevention of fugitive emissions.

Action: Operator to include the agreed operating techniques in the sites EMS to prevent further breaches of the permit.

Table 2.1– Raw material intake details

Intake Type	Raw Material Type	Fugitive Atmospheric Emission Abatement	Vented To
Intake 1	Dry (Granular)	Fan and dust units	Inside building
Intake 2	Dry (Granular)	Fan and dust units	Inside building
Pneumatic (minerals x5)	Dry (Powder/granular)	Bag filters	Inside building
Molasses	Liquid	-	-
Fats	Liquid	-	-

All abatement systems to prevent fugitive emissions to the atmosphere are maintained under service contracts as required for insurance purposes.

Dust monitoring from the product coolers is carried out annually and visual assessments are carried out and recorded daily.

Objective 6: To remind the operator of requirement to review and update the approved documentation linked to the environmental permit.

KD enquired about how the requirements of the environmental permit are managed by the operator since the date of issue on 5 July 2010 particularly as an EMS has not been implemented on site. SC explained that she had been in the process of reviewing the draft EMS. There was no demonstration of how the permit requirements are managed during this audit which did not provide NRW with confidence that deadlines would be met. Therefore as a reminder KD mentioned that there are a number of documents that require a 4 year review (by 5 July 2014) e.g. Accident Management Plan, Energy Efficiency etc. It is important that the operator is familiar with the requirements of the permit to ensure that this work is managed effectively and that documentation associated with the permit is used and kept up to date.

For example and ease of reference the application for the environmental permit states the following for energy management techniques:

4.2.4 Energy management techniques

Wynnstay operate an Environmental Management System (EMS) which details the energy management policies for the installation. The system sets objectives and procedures to monitor, report and improve energy efficiency at the mill. The EMS manual is included in Appendix 7.

Energy management was not explored any further during this audit however again the operator did not demonstrate compliance with agreed operating techniques in the permit.

Recommendation: Operator to review Appendix 7 of the application linked to the environmental permit to ensure that the EMS is being managed according to the agreed techniques.

Recommendation: Operator to review the requirements of the environmental permit to ensure that the document reviews required by 5 July 2014 are undertaken.

Site Observations

A site visit was carried out where the operator was able to demonstrate the improvements made relating to fugitive emissions and drainage work. KD was accompanied on the site visit by RF, HJ and SC.

The environmental permit for the Llysonnen mill was issued on 5 July 2010. The permit included a number of improvement conditions relating to tank bunds and site drainage works to bring the site up to the required standard. Unfortunately the operator failed to meet the deadlines on the improvement condition submissions and this has incurred a penalty on the Operator Performance Risk Assessment (OPRA). Furthermore the requirements of these improvement conditions have not been completed due to a number of staff changes and delays in the work. As part of this visit progress on the completion of the drainage work was assessed.

The visit began at the site office where it was immediately evident some good progress regarding the completion of the drainage works had taken place since the new mill manager had been in post. Clear distinction between the surface water and foul was apparent allowing for quick on site identification in the event of a spill or when needed for effluent removal etc.



The photographs above were taken of the drainage works that have been undertaken closest to the site office. The clean surface water from the site office has been directed to the drain above left and the foul from that building goes to the sealed cesspit above right. Since the last visit improvements on the site drainage had clearly taken place and this should help with the long standing issue of elevated biological oxygen demand (BOD) on the discharge from the site.



The photographs above were taken of the area close to the raw material intake, the interceptor had been colour coded and a concrete plinth installed to help with the continued maintenance. The photograph to the left shows the mains water to the site (yellow), newly installed kerbing and a new drain. This improvement work at the site will facilitate with the separation of clean from any contaminated surface water run-off in the yard.

Action: Operator to provide an up dated copy of the revised drainage plan following the completion of the improvement works on the site drainage.

Raw Material Intake 1 and 2

The photograph below left was taken during the site visit on the 21 September 2012 at that time damage was evident on the extraction curtain and dust could be seen in the bays. The photograph below right was taken during this visit and the difference on the bulk delivery raw intake bays was immediately noticeable. The bollards preventing damage to the building had been painted; the extraction system had been replaced including the plastic curtains to direct any dust into the abatement unit. The self cleaning of the extraction system was witnessed during the visit where loose feed is dislodged back down through the rubble separators for internal transfer to the appropriate silos or storage bins. New cameras have also been installed in the bay providing better management of a delivery from the main control room. The operator explained that drivers are also asked to use their grain 'socks' on their vehicles when making a delivery and this was sign posted in the control room.



As part of the yard work the concrete plinth at the base of the overhead conveyor had also been re-painted. The operator stated that it was now more visible to drivers as accidents involving the plinth had occurred due to driver error.

Drainage works to the north east corner of the site can be seen in the photograph below left with kerbing and a new surface water drain was under construction at the time of the visit. The drainage work has clearly made a positive difference to the site. There was some further maintenance work yet to be done to separate the clean water from the buildings in this location. HJ explained that a platform would be required to clean out the gutters which had some significant vegetation growth in them and this can be seen in the photograph below right.



A discussion was held with the operator regarding the drainage ditch and cesspit that serves the staff canteen in this location of the site. At the time of the visit the level alarm on the cesspit was going and HJ explained that it is alarming far too frequently (weekly basis). HJ stated that the cesspit may be filling up too quickly as it might have had a soak away associated with it or clean water is still entering the foul system. Investigatory work is on-going at the mill as part of the completion of the drainage works in order to determine the root cause of the foul drainage problem in this area.

Action: Operator to complete investigation and drainage work to ascertain the foul drainage problem concerning the cesspit that serves the staff canteen as this may be the root cause of the on-going issue concerning the high BOD in the discharge from W1.

House-keeping on the site was good and this was evident along the northern boundary of the site with wastes having been removed from the drainage area around the fuel tank in the NW corner of the site. KD enquired about the drainage along the northern boundary as it was understood that an interceptor was present in this location and telemetry was due to be installed (CAR reference 4807). HJ explained that drainage investigations were not yet complete in this part of the site.



The photograph above left shows the fuel tank in the north west corner of the site. The photograph above right was taken of what was understood to be an oil interceptor and pipe-work for proposed telemetry on the building wall.

Action: Operator to provide clarity on the drainage in the NW corner of the site through the submission of an updated map on completion of the work.

The photograph below left shows the improved kerbing and site boundary providing improved surface water management from the site



Progressing along the western boundary KD enquired about the site warehouse and a brief visit of this section was made. From the entrance to the warehouse a Wynnstay lorry was seen to be utilising the vehicle wash and this can be seen in the photograph above right

Housekeeping within the warehouse was also good however a full Integrated Bulk Container (IBC) of 'Adblue' was on the floor in the top part of the building. The IBC had been placed next to an almost empty one that was on a drip tray. KD progressed down the ramp from the top section of the warehouse to identify where the 'Adblue' would drain if compromised. There is a drain close to the bottom of the ramp within the warehouse however it was unclear if it was a surface water drain. Diesel Exhaust Fluid (DEF) commonly referred to as 'Adblue' can be extremely pollution to the aquatic environment as it will cause de-oxygenation of a water body.

Recommendation: Operator to review Environment Agency Pollution Prevention Guidance (PPG) 26 'Drums and Integrated Bulk Containers' <http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>

Recommendation: Operator to review the containment of liquids within the warehouse and in particular the storage of 'Adblue' in relation to any surface water drains. Operator to consider the use of the building to act as containment i.e. through kerbing, 'sleeping policeman' etc



The photograph opposite was taken of the full replacement IBC of Adblue on the floor of the warehouse next to the drip tray.

The visit progressed to sample point W1 in the eastern corner of the site, SC accompanied KD in this area. The sample point was overgrown making access difficult. As mentioned on previous visits the sample point needs to meet monitoring technical guidance note M18 <http://www.environment-agency.gov.uk/business/regulation/31831.aspx>. The sample point should be permanently labelled to ensure that staff are clear where to take the sample and it is truly representative of the discharge from the site. It was considered that the assessment of the sample point during this visit was non-compliant with permit condition 3.5.4 and has incurred a category 3 score. The photograph below left was taken of the overgrown sample location.



Action: Operator to review sample point (W1) at the Wynnstay mill to ensure compliance with permit condition 3.5.4.

On leaving the location of W1 grain was evident at the base of the silos to the rear of the mill. KD enquired over the spillage, HJ explained that a high level alarm had failed just prior to the NRW audit. It was agreed that this event did not fall under the notification requirements of the permit.

Recommendation: Operator to investigate the root cause for the grain spillage in order to prevent a re-occurrence at the mill.

During the site visit the HJ informed KD of the proposal to improve the bund to the molasses and fat storage tanks. During the write up of this report the photographs below of improvements made to the delivery area and bund on the tank farm were sent to KD. This work forms part of the completion of the drainage work and improved surface water management system on site.



Conclusion

During this audit it was evident that the operator has made some very good progress on the site drainage works. Furthermore improvements to the raw material delivery bay have taken place and since June 2013 no complaints of dust concerning the site have been received by NRW. However in some areas examined during the audit non-compliances with the environmental permit were identified relating to:

- the agreed operating techniques,
- records of activity;
- monitoring and reporting.

Compliance could not be validated in some areas visited by this audit as the operator only verbally stated that conditions were being met. The operator cannot rely on verbal evidence to demonstrate compliance with permit conditions. We would expect that physical evidence is produced e.g. inspection records; procedures, work check sheets etc in any future audit to demonstrate permit compliance.

[End]

	EPR Compliance Assessment Report	Report ID: 5135
This form will report non-compliance with your permit as determined by an NRW officer		
Site	Llysonnen Mill	Permit EP3034GS
Operator/ Permit	Wynnstay Group PLC	Date 6 November 2013

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.		✓
We will now consider what enforcement action is appropriate and notify you, referencing this form.		

Section 4- Action(s)			
Where a 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			
NB/ Some actions below do not have a CCS breach against it as a single breach of a condition is only record once to prevent double counting.			
-	-	Action: Operator to provide a timeline for the implementation of an EMS and associated procedures at the Llysonnen Mill.	27 Nov 2013
G4	4	Action: Operator to re-submit the quarterly monitoring return for 1 April to 30 June 2013 with the correct sample times and dates and inclusive of the units on the results.	27 Nov 2013
		Action: Operator to re-submit the quarterly monitoring return for 1 July to 30 September 2013 with the correct sample times and dates and inclusive of the units on the results.	27 Nov 2013
-	-	Action: Operator to include the maintenance requirements of the abatement systems in the EMS for the prevention of fugitive emissions.	28 February 2014
G2	3	Action: Operator to include the agreed operating techniques in the sites EMS to prevent further breaches of the permit.	28 February 2014
N/A		Recommendation: Operator to review Appendix 7 of the application linked to the environmental permit to ensure that the EMS is being managed according to the agreed technique.	N/A
		Recommendation: Operator to review the requirements of the environmental permit to ensure that the document reviews required by 5 July 2014 are undertaken.	N/A
-	-	Action: Operator to provide an updated copy of the revised drainage plan following completion of the improvement works on the site drainage.	28 February 2014

-	-	Action: Operator to complete investigation and drainage work to ascertain the foul drainage problem concerning the cesspit that serves the staff canteen as this may be the root cause of the on-going issue concerning the high BOD in the discharge from W1.	28 February 2014
-	-	Action: Operator to provide clarity on the drainage in the NW corner of the site through the submission of an updated map on completion of the work.	28 February 2014
N/A		Recommendation: Operator to review Environment Agency Pollution Prevention Guidance (PPG) 26 'Drums and Integrated Bulk Containers' http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx	N/A
		Recommendation: Operator to review the containment of liquids within the warehouse and in particular the storage of 'Adblue' in relation to any surface water drains. Operator to consider the use of the building to act as containment i.e. through kerbing, 'sleeping policeman' etc	N/A
G1	3	Action: Operator to review sample point (W1) at the Wynnstay mill to ensure compliance with permit condition 3.5.4.	N/A
N/A		Recommendation: Operator to investigate the root cause for the gain spillage in order to prevent a re-occurrence at the mill.	N/A

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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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.

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

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) 601 0987**.