

	EPR Compliance Assessment Report	Report ID: 5638
This form will report compliance with your permit as determined by an NRW officer		
Site	Pembroke Power Station	Permit Ref DP3333TA
Operator/ Permit holder	RWE NPower plc	
Date	25 June 2014	Time in 10:00 Out 15:30
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	Ben Williams Regulation and Business Performance Section Head, Dafydd Williams Environmental Engineer	
Officer's name	Karen Dunn / Gareth Lewis	Date issued 14/07/2014

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	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	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	A	
	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Persons Present :

Gareth Lewis (GL) NRW Compliance and Community Liaison Officer
Karen Dunn (KD) NRW PPC Compliance Officer
Ben Williams (BW) - RWE Regulation and Business Support Section Head
Daffyd Williams (DW) – RWE Environmental Engineer

The following agenda items were provided prior to the audit:

- Introductions
- EMS - Condition 2.3 Operating Techniques in particular – water efficiency and waste minimisation
- Monitoring programme – agreed submission dates
- Reporting – LCPD register / reporting form
- Technical Change W2 – BW e-mail of 19/06/2014
- Maintenance programme 2015/16
- AOB – to include proposed projects below: MXL upgrade, Biocide Optimisation, Foam Trial – timeline for final implementation, COMAH – pipeline query, condensate polishing plant
- OMA – future dates for OMA air and water
- measurement/ reporting of the instantaneous flow limit in the abstraction license

Introduction

Following staff changes within the NRW PPC team on 1 April 2014 Karen Dunn has been assigned to the regulation of the Pembroke Power Station (PPS) with Gareth Lewis. Any future correspondence should also be sent to karen.dunn@cyfoethnaturiolcymru.gov.uk. This was the first audit undertaken by PPC officer Karen Dunn at the RWE Pembroke Power Station. Prior to this audit on 11 June 2014 an introductory site visit was attended by NRW Environment Manager West Huwel Manley and Karen Dunn for familiarisation purposes. The introductory visit took place following NRW attendance to the RWE Pembroke Power Station Local Liaison Committee meeting.

Objective 1: To establish the status of the Environment Management System (EMS) and associated procedures linked to the environmental permit for the PPS.

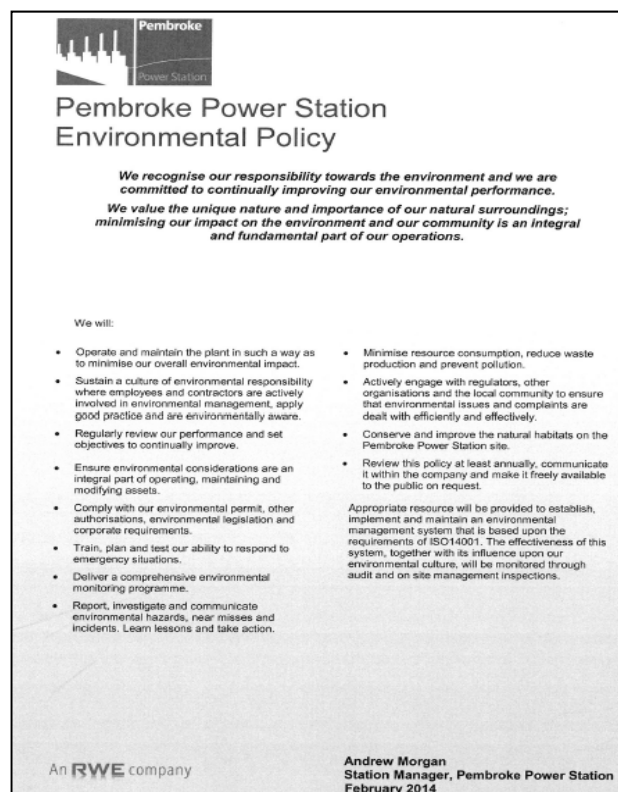
A site specific EMS has been developed for the power station which is based on the ISO14001 standard. The EMS can be accessed on site using the Pembroke Asset Management System (PAMS). PAMS is available to all site staff and employees within RWE who need to use it in their roles and responsibilities. Shortcuts are built into PAMS for quick access which includes Environment, Health and Safety (MADISON system), Plant Documents (OEM) and Policy and Strategy. BW demonstrated the EMS through PAMS and explained how employees have read access to it. The operator is working towards an accredited EMS however this has been delayed due to staff change. A request was made for a copy of the Environmental Policy within the EMS. BW provided a copy of the most up to date policy dated February 2014 and signed by the plant manager Andrew Morgan. Unfortunately the previous version of the Environmental Policy was linked to the EMS. Immediately following the audit BW advised that the updated policy is now linked to the EMS. It was considered that a copy of the February 2014 policy was sent for uploading when the paper copies were updated around the site but had become lost in the system.

Recommendation: Operator to review the EMS to ensure that the documentation is up to date following staff changes at the power station.

Environmental compliance monitoring data is collated from the main operating system or DCS which is used in the stations control room and the relevant data trended using PI. The trending of this data gives an immediate visual aid to the environmental parameters being measured by the power station against trigger levels and emission limit values in the permit. The trending of environmental data is considered to be good practice and demonstrates that the operator is interpreting and managing the data, it also helps in the provision of a visual early warning if a parameter is reaching a trigger level or permit limit. BW explained that the data is routinely checked and demonstrated the use of the trended data during the audit on unit 21. Unit 21 is due for maintenance soon (Objective 5) and this was reflected in the trended NOx and CO results compared to other units.

Compliance with permit condition 2.3 Operating Techniques was assessed to examine the EMS.

Permit condition 2.3.1 is linked to Table S1.2 which in part refers to the supporting document that accompanied the application entitled 'Supporting Document for a New Environmental Permit Application Ref: JP3638LK'. In the supporting document there was a commitment from the operator to undertake a waste and water efficiency audit. These commitments have been replicated below for ease of reference:



2.4.1 Minimising Water Use – Cooling

A water efficiency audit has not been carried out for the installation yet; this will be carried out within 2 years of permit issue.

2.5 Waste Handling

A waste minimisation audit has not been carried out for the installation; this will be carried out within 2 years of permit issue.

The permit was issued on November 2011 so a request was made during this audit for a copy of these audits. BW explained that the operation of the power station passed to RWE in September 2012. Since that time further work on both water minimisation and waste handling have taken place.

Minimising Water Use

During this audit Vasilis Katsapis (VK) the Lead Performance Engineer outlined work undertaken on water savings at the station. In brief a Business Improvement Process or BIP was initiated by RWE for a holistic approach to a matter concerning boiler blow down.

During commissioning PPS experienced high levels of boiler blow down with up to 18-22m³/hr on a unit. Boiler 'blow down' (BD) is necessary for water renewal and chemistry control. Typical blow down rates are usually around 1-2% which would be approximately 6/8m³/hr (assuming base load operation) for each unit. Boiler blow down rates can increase when boiler chemistry is sub optimal or when isolation drain valves are leaking. The high level of BD was due to the low quality and reliability of the heat recovery steam generator (HRSG) drain isolation valves. Each HRSG contains around 400m³ of demineralised water and there are approximately 50 to 60 drain valves on site.

VK explained the work identified as part of this BIP and how the power station build contract wouldn't have necessarily included the level of detail on the drain valves. RWE made the decision therefore to go outside warranty and replace all vulnerable drain valves. The operator is currently at stage 3 of a phased approach to this work and 10 to 12 drain valves have currently been replaced. The improvement is involved and needs an extended outage of a unit for cooling time etc permits to work and double isolation of the valves for health and safety reasons. Furthermore this work has seen amongst other things tighter chemistry control and routine monthly 'drop tests' (amount of water lost per hour) As a result the operator is now achieving 2-3 m³/hr which is less than the typical rate without impacting on the chemistry.

Next steps were also outlined by VK which included the sharing of any good practice with other stations, a feasibility study on the recirculation of the BD and the maintenance of the process. It was also very encouraging to hear that water savings is a cultural habitual element from RWE rather than an engineering initiative.

Waste Handling

DW explained that in 2013 work was being finalised on the construction side of the power station and this still involved the generation of some wastes. Since then the operator has had a waste contractor on site to look at the various waste streams produced at the station to provide advice and guidance on the operator's waste handling.

Furthermore in July 2013 a permit variation was issued to RWE following an application for sewage treatment on site. This was an alternative to the removal of effluent off site by tanker for disposal at the Pembroke Dock sewage treatment works (STW). As a result this change has seen a significant reduction in the amount of waste tanker movements attending the site.

Clearly some significant work has taken place around water minimisation and waste handling at PPS. This work needs to be pulled together and documented in an audit report to capture the findings, any proposed actions or any future improvement work that has been identified. It was agreed that the operator would document the audits within 2 years of RWE taking over the site (September 2014).

Action: Operator to document the water minimisation and waste handling audit work undertaken at the power station by 30 September 2014.

Recommendation: Operator to review the EMS to ensure that all the requirements of the environmental permit have been included to prevent a breach.

Objective 2 – To discuss environmental monitoring with the operator and any agreed submission deadlines concerning the results.

For the benefit of KD a brief discussion was held during this audit on the environmental monitoring undertaken by the operator for the PPS. During the introductory visit BW and Roland Long (Production Manager) outlined to HM and KD the monitoring programme and how baseline environmental monitoring studies of the Milford Haven Waterway were undertaken between 2007 and 2012. The environmental monitoring programme in and around PPS is extensive due to the once through cooling water abstraction and discharge to the Milford Haven Waterway which is a Special Area of Conservation (SAC). This operator's contractor Jacobs has been involved in this work and advises on the data collection. The environmental monitoring is undertaken on an annual basis although there is on-going discussions and meetings between NRW and RWE concerning this monitoring work. This work is directly linked to the operator's abstraction licence and the Pre-Operational conditions in the environmental permit.

During this audit KD wished to gain a better understand of any submission deadlines for the reports submitted in respect of the environmental monitoring. It has been agreed previously that the reports come into NRW around the first quarter of the financial year giving time for it be collated, assessed, reviewed and quality assured. For 2014 the data set is expected to be submitted to NRW in July 2014. It was also suggested in this audit that the monitoring programme for 2015 should be held in advance of the new year around November 2014.

Action: Meeting to be arranged for November 2014 concerning the 2015 monitoring programme.

Objective 3 – To discuss the Large Combustion Plant Directive (LCPD) reporting forms in the environmental permit with the operator.

Following a recent change in the reporting of the annual data required by the LCPD NRW requested that the operator completes an electronic AAE1 form for each unit. The form has a section to input the ID reference for each LCPD from the DEFRA register. PPS has 5 LCPD units however due to an inventory error only one ID reference was allocated to PPS. This was raised by the NRW combustion lead (Tony Leakey) to the EA Combustion Technical Advisor (Richard Chase) to raise with DEFRA for rectification.

The operator has reported against the 5 LCPD units for 2013 on separate AAE1 forms and these have been submitted to the register. It is advised that when DEFRA processes the AAE1 forms in

September/October ID references will be allocated for future use. BW asked if there was anything that could be done by RWE regarding the ID reference inventory error. KD advised that a recent review of the LCPD register included all 5 units and the ID reference matter is now with DEFRA.

As a result of this inventory error the LCPD reporting forms in the permit were reviewed by KD to ensure they include the 5 units. The review found that the reporting forms are suitable and include the need for RWE to report the data against all 5 units so no change is required as a result.

Discussions are currently being held between NRW, EA and DEFRA on the use of electronic reporting and the future use of the AAE1 form for the annual LCPD data collection. If this goes ahead it will be important for RWE to have the 5 ID reference numbers for each unit to be able to do this.

Objective 4: To discuss recent correspondence concerning discharge point W2 as defined by Condition 3.1.1 and Table 3.2 in the permit.

On 18 February 2014 the operator wrote to NRW concerning the point source description in the permit for W2 which is 'Uncontaminated surface water run-off including roof drainage'.

In brief the operator raised the issue that the as built drainage system consists of four streams to discharge point W2. Two streams were considered outside the W2 source description namely some process drains that serve the safety showers, total residual oxidant sample cabin drains turbine hall floor drains etc (RWE letter ref: DP3333TAW2). GL requested further information on e-mail dated 18 February 2014 concerning expected volumes and flows from the additional streams. RWE has replied outlining the expected flows and volumes of the additional streams and provided justification that there would be no environmental impact as a result. It is acknowledged that the operator has raised this matter with NRW who accepts the deviation from the source description until such time the permit is varied. It is advised that the operator includes this change to W2 when applying for a proposed future variation to the permit.

Action: Operator to include a change request concerning discharge point W2 in a future variation application to the permit.

Objective 5: To obtain an overview of the proposed 'C' inspection outages 2015/16.

During the Community Liaison Committee Meeting and introductory visit RWE outlined that 2015/16 will see the first major shut and strip down of the gas turbines at the PPS. This will be the first major milestone for the turbines since they were commissioned. The timing of this work is based on a number of factors which include the running hours, starts WCE (weighted cyclic events) and EOH (equivalent operating hours) and they are also influenced by the market and commercial parameters. Alstom who manufacture the turbines at PPS has set the periodicity of the 'C' inspection intervals. Therefore the work also depends on the availability of the Alstom staff, when statutory inspections are due and the preference to undertake in least valuable periods. The C inspection will therefore see additional staff at the PPS with a maximum of 150 contractors. In short the duration of each C inspection will be approximately 50 days on a rotating basis with approximately 5 to 8 days in between. The scope of the work will include but is not limited to:

- continuous emissions monitoring (CEMS) inspection;
- HRSG valve replacement and stator inspections on pressure parts and vessels;
- Steam turbine strip and rebuild;
- Instrumentation tests and calibration;
- Pump and pipework inspections
- Drum screen inspection tests and calibration;
- Generator internal inspection and maintenance;
- MXL2 upgrade on gas turbine.

BW explained that it is proposed that the first C inspection will take place on unit 31 in April 2015.

Action: Operator to provide a commissioning plan to NRW by end of 2014 for the return to service of each unit following a C inspection.

Provision will be made to accommodate the additional contract staff at the PPS during the inspection period. However as a consequence there will be additional waste generated. BW is currently looking at the best environmental option and it is currently proposed that additional foul drainage will be installed from the car park linking to the main building rather than using waste tanks for off-site disposal. BW enquired if this would require an amendment to any aspect of the permit documentation. BW also explained that there is suitable capacity for the additional foul drainage at their sewage treatment plant. It is noted in the permit variation for the treatment plant that it is for the treatment of waste generated from RWE staff and contractors.

Action: If the additional foul drainage is installed for contractual use the operator will need to review the relevant site procedures and update them accordingly to ensure suitable preventative maintenance and inspection.

Action: Operator to update the site drainage plan on completion of any extension works to the foul drainage to accommodate the C inspection workforce.

Objective 6: To briefly discuss proposed work and queries raised by RWE during the introductory visit.

- MXL Upgrade – This work has is also included in the C inspection and will is not expected to impact on the environmental permit.
- Biocide Optimisation – RWE have considered alternatives to the use of Sodium Hypochlorite at the station. However there is currently no movement on a proposal as more information is required regarding alternative technologies. It is good however that the operator is considering alternatives to the more polluting raw materials used at the station.
- COMAH – Pipeline Query – Due to the consultation of the draft COMAH Regulations 2015 to implement the Seveso III Directive. RWE has approached NRW as part of the competent authority with a number of queries concerning the PPS. KD discussed these with Mark Broom the NRW COMAH inspector for the site. At the time of this audit the new regulations were under consultation and it was recommended that RWE provide comment through the HSE. BW confirmed that the group would be making comment to ascertain what the new regulations will means for the operator.

Action: KD to reply to BW email of 23 June 2014 regarding queries concerning the new COMAH regulations and the gas pipeline advising that RWE seeks advise from the HSE on this matter.

- Proposed Condensate Polishing Plant – To minimise the risk to the boilers and auxiliary plant from sea water leakage into the boiler water systems RWE propose to install a boiler condensate “polishing” plant to remove inorganic contaminants from sea water leaks. This project has been placed on stop for the time being.
- Operator Monitoring Assessments (OMA) – NRW propose to undertake an OMA for air and one for water during 2014/15. Future proposed dates for this work will be posed to RWE.

Objective 7: To provide feedback concerning the operator’s trial to minimise the potential for foam on the Milford Haven Waterway and to gain a timeline for final implementation.

During the 25 May 2014 bank holiday RWE undertook a trial regarding the reduction and minimisation of foam on the discharge from the Pembroke Power Station. The visual impact of the foam has been concerning the local community especially when it washes up on the shoreline. In brief sea water from the once through cooling system discharges to the seal pit that was built in part for the original power station that closed in 1997. As water passes over a concrete weir in the pit it entrains air forming white foam. As the bubbles then burst the foam turns brown due to organics in the sea water. The trial involved a substantial structural modification which could only be undertaken when the power station was non-operational.

On 11 June 2014 RWE presented the detail of the structural change to the seal pit in an update of the

project at their Local Liaison Committee (LLC) meeting. The work RWE had undertaken was well received by the LLC. NRW are also encouraged by the operator's efforts to seek an alternative to the addition of de-foaming agents by means of a site infrastructure modification. The results of the trial seem promising however this is still an on-going issue and NRW continue to receive reports of foam coming from the PPS. A further update on the final implementation of this work was provided during this audit. In that due to the complexities of the work and the need for a station outage it is likely that it will now coincide with the April C inspection. It is expected that the work will be undertaken before May 2015. It is considered that the foam becomes less of an issue between October and March.

The photographs below were taken by the operator during the foam trial and show the restrictor gate being craned into the seal pit as well as a diver used in the undertaking of this work.



Objective 8 – To discuss the measurement and reporting against the instantaneous flow limit in the abstraction licence.

A brief discussion was held at the end of this audit concerning the instantaneous flow data measurement data linked to the sites abstraction licence and environmental permit. Currently the operator is gathering further information regarding the presence of 'chatter' that has been noted within the data. Once further detail has been obtained for each of the units this will be discussed within RWE and raised if necessary with NRW at a later date.

Company Name Change

Following the audit on the 26 June 2014 RWE formally notified in line with permit condition 4.3.3 and 4.3.4 of the permit variation that as of 1 July 2014 RWE Npower plc will become RWE Generation UK plc.

Action: KD has contacted NRW permitting concerning the transfer of the abstraction licence following the change in company name and to respond to BW on receipt of their response.

Action: Operator to provide NRW with a copy of the certification of in-corporation following name change.

Conclusion

This was the first audit undertaken by KD and mainly followed a broad audit approach to operations and any ongoing and proposed improvement projects that could impact on the environmental permit. A more in depth audit approach was taken on the agreed operating techniques linked to the environmental permit in particular the operator's commitment to audit against waste handling and water minimisation. Some staff role changes appeared to have impacted on the timeline proposed for accreditation of the EMS however this has been recognised by the business. It was apparent from this audit that RWE has undertaken some significant environmental improvements since taking over the operations of the power station and this was evident in the work that has been carried out on reducing the amount of boiler blow

down from a maximum of approximately 18-22 m³/hr to a level today of 2-3 m³/hr for a LCPD unit. Also NRW is encouraged by the trial on the reduction and minimisation of foam on the power station discharge. In particular RWE's approach to seeking a modification to the infrastructure instead of using deforming agents. There were no permit breaches identified as part of this audit. All actions have been consolidated in the table below.

[End]

	EPR Compliance Assessment Report	Report ID: 5638	
This form will report non-compliance with your permit as determined by an NRW officer			
Site	Pembroke Power Station	Permit	DP3333TA
Operator/ Permit	RWE Npower plc	Date	25 June 2014

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			
No CCS breaches were identified but the following actions have been required of the operator:			
N/A		Recommendation: Operator to review the EMS to ensure that the documentation is up to date following staff changes at the power station.	N/A
		Action: Operator to document the water minimisation and waste handling audit work undertaken at the power station by 30 September 2014.	30/9/2014
		Recommendation: Operator to review the EMS to ensure that all the requirements of the environmental permit have been included to prevent a breach.	N/A
		Action: Meeting to be arranged for November 2014 concerning the 2015 monitoring programme	By 28 Nov 2014
		Action: Operator to include a change request concerning discharge point W2 in a future variation application to the permit.	On submission of future variation application.
		Action: Operator to provide a commissioning plan to NRW by end of 2014 for the return to service of each unit following a C inspection.	By 31 December 2014
		Action: If the additional foul drainage is installed for contractual use the operator will need to review the relevant site procedures and update them accordingly to ensure suitable preventative maintenance and inspection.	Prior to use
		Action: Operator to update the site drainage plan on completion of any extension works to the foul drainage to accommodate the C inspection workforce.	On completion of any drainage work.

	Action: KD to reply to BW email of 23 June 2014 regarding queries concerning the new COMAH regulations and the gas pipeline advising that RWE seeks advise from the HSE on this matter	By Tuesday 15 July 2014
	Action: KD has contacted NRW permitting concerning the transfer of the abstraction licence following the change in company name and to respond to BW on receipt of their response.	15 July 2014
	Action: Operator to provide NRW with a copy of the certification of incorporation following name change.	31 July 2014

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**.