

EPR Compliance Assessment Report

Report ID: 6001

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 Generation UK Ltd						
Date	17 September 2015			Time in	10:00	Out	16:30
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 – Lead Environmental Engineer Dafydd Williams – Environmental Engineer						
Officer's name	Karen Dunn – PPC Officer			Date issued		23 December 2015	

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	A	
	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	A	
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	A	
	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	A	
	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	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	0	Total compliance score (see section 5 for scoring scheme)	0
-----------------------------	---	--	---

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This was a pre-arranged audit and the following agenda was provided prior to the visit:

1. Actions / Recommendations previous Compliance Assessment Report (CAR) form 5910
2. Foam Incident and optimising of new system - Discharge point W1
3. Review of IC table. S1.3 and S1.4 PO with operator during the audit
4. Oil & Chemicals Stored in main turbine halls (3 out of 5 inspected)
5. Brief update on current position concerning IED permit review
6. Site tour to look at those areas visited by the audit.
7. AOB

The operatives present were:

Ben Williams – Lead Environmental Engineer
Dafydd Williams - Environmental Engineer

Introduction

The visit began with introductions and overview on operations since the last audit. In brief work on the first major outages or the 'C' inspections are going well and 3 of the 5 units are complete. The drum screens on the fish return system intake have recently been cleaned and are currently being monitored on a 24 hour basis as this time of year the natural die back of the eelgrass can require removing from the fish return system to prevent blockages.

Objective 1 - To review the Actions / Recommendations from the previous CAR form reference 5910 with the operator.

The actions from the previous car have been replicated below for ease of reference.

Action from CAR 5910:		Status
1	Action: Drainage plan to be updated to include the changes made in respect of the cesspit installed in the car park and associated drains.	See action 2 below
2	Action: Operator to review and up-date the accident management plan linked to the site's written management system (EMS).	Review complete some minor changes required i.e. drainage map to be updated and included.
3	Action: If on review of the accident management plan (PO2 response) any significant changes are made i.e. updated drainage plan etc. a copy should be e-mailed to KD to update NRW files.	On-going until Feb 2016

Objective 2 - To gain an update on the 'Foam Reduction Project' and the optimising of the system following reports of foam during the autumnal high tides and to visit discharge point W1.

Since commissioning and most noticeably during high spring and autumn tides foam occurs on the discharge of water to the Haven. The foam is akin to sea foam and is considered to have no environmental impact although it is an amenity concern. RWE has made a commitment to the community (through the LLC) and NRW to address the issue and discussions have taken place over the operator's 'Foam Reduction Project'.

This summer during the 'C' inspections 2 permanent penstocks were installed in the seal pit prior to the discharge. These aim to raise the water level over a weir in the pit to prevent air entrainment and foam formation. When the bubbles in the foam burst it turns brown due to the organic matter in the sea water. In recent months NRW have received around 4 complaints of foam from members of the public who have noticed it on the discharge.

Work proposed at the time of the audit involved the electrical connections to the penstocks for automation and final optimisation of the system to ensure it operates as modelled. Project completion is estimated to be prior to the Spring tides 2016. This optimisation stage is crucial so not to flood the station especially during high tides. The final discharge point W1 was visited during this audit and the following photographs were taken.



The photograph above left shows the foam in the seal pit on the day of the visit. The middle photograph shows the foam in the old inspection chamber which due to the high autumnal tides had overflowed down the bank and can be seen beyond the shingle bank in the water. These photographs are pictures of the foam at its worst due to the specific weather and tide conditions on the day of the visit. The far right hand photo shows the foam in the waterway which extended across the Haven due to the wind and tide.

Review of IC table. S1.3 and S1.4 PO with operator

In this section of the visit the improvement conditions (Table S1.3) and pre operational conditions (Table S1.4) in the permit were reviewed with the operator. This was considered to be a timely exercise in light of the permit review to include the emission limit values in Annex V of the Industrial Emissions Directive (IED). The following tables have been replicated from the permit for ease of reference and a column added confirming the status of each improvement and pre-operational condition. Documentation demonstrating the submissions and sign off from the regulator was identified with the operator during this review.

Table S1.3 Improvement programme requirements			
Reference	Requirement	Date	Status
IC1	The Operator shall submit to the Environment Agency at the Reporting Address a written report on the commissioning of the Installation. It shall report in accordance with the approved commissioning plan and shall detail: – The environmental performance of the Installation as installed against the design parameters set out in the Application; – The performance of the turbines under various operating loads and start-up (both hot and cold) and shut-downs; – A comparison of the efficiency and performance of the five units;	One month after the completion of commissioning of the five gas turbines or 30/06/2013, whichever is the earlier.	Complete

	– A review of the performance of the Installation against the conditions of this Permit; – The procedures developed during commissioning for achieving and demonstrating compliance with permit conditions and Environment Agency guidance; and – The results of the commissioning phase noise survey in line with the approved proposals. The Report shall also detail any minor improvements and modifications identified as part of the commissioning and a timetable for their implementation. Any changes approved in writing by the Environment Agency shall be implemented in accordance with that approval.		
IC2	The Operator shall: (a) Submit to the Environment Agency at the Reporting Address for approval written proposals for carrying out a noise survey to assess the impact of the Installation when fully operational and covering the full range of potential operating techniques. The proposals shall include the comparison of measured data against the information supplied in Chapter 2 of Part 2 of Volume 2 of the Application. The proposals shall also contain details of the methods to be used for the assessment of tonal noise at sensitive receptors and proposed a timeframe within which the survey will be undertaken; (b) Carry out the noise survey in accordance with the Environment Agency's written approval; (c) Submit a written report of the findings of the noise survey to the Environment Agency at the Reporting Address for approval; and (d) Submit to the Environment Agency at the Reporting Address for approval a written report which assesses whether any minor improvements and modifications are required to noise mitigation measures. Where such measures are required, the Operator shall provide a time-bound programme for their implementation.	In respect of (a), 6 months after the completion of commissioning of the first gas turbine. In respect of (b), in accordance with the Environment Agency's approval. In respect of (c), one month after completion of the noise survey. In respect of (d), 2 months after completion of the noise survey.	Complete (NB/ Typographic error noted on CAR 5493 dated 3 March 2014

Table S1.3 Improvement programme requirements (continued)			
Reference	Requirement	Date	
IC3	The Operator shall provide an acoustic screen for the cooling water pumps in accordance with the Environment Agency's written approval.	As specified in the Environment Agency's written approval of the Operator's response to PO3.	Complete
IC4	The Operator shall submit to the Environment Agency at the Reporting Address a written report detailing the baseline environmental information obtained in accordance with pre-operational measure PO4.	10/05/2012	Complete
IC5	The Operator shall submit to the Environment Agency at the Reporting Address for approval a written site closure and decommissioning plan. The Plan shall be based on the final constructed plant design and shall demonstrate how best environmental practice will be used to ensure that the impact on the environment will be minimised during any closure or decommissioning of all or part of the Installation.	10/11/2012	Complete

IC6	The Operator shall submit a written report to the Environment Agency for approval providing details of the optimisation of dosing of the main cooling water system with chemical bio-fouling control agent so as to minimise total residual oxidant emissions, within the emission limit values described in this permit, whilst maintaining the efficiency of the cooling system. The Report shall include details of the manner in which the Operator proposes to use mechanical means of bio-fouling control as far as practicable in preference to chemical dosing. The Report shall be implemented in accordance with the written approval of the Agency.	2 months after the completion of commissioning of the five gas turbines or 28/02/2013, whichever is the earlier.	Complete
IC7	The operator shall submit to Natural Resources Wales a report detailing the findings of the monitoring undertaken during the first 6 months of operation of the sewage treatment plant. The report will demonstrate the effectiveness of the sewage treatment plant and identify whether or not further mitigation techniques are required to reduce the discharge of the Ammonia. On submission of the report to NRW the monitoring requirements and the emission limit for Ammonia will be reviewed.	8 months after start of discharge	Complete

Table S1.4 Pre-operational measures		
Reference	Pre-operational measures	
PO1	Prior to the operation of the Installation a written commissioning plan (including timelines for completion) shall be submitted to the Environment Agency at the Reporting Address for approval. The commissioning plan shall include but not be restricted to: – The timetable for the commissioning of the five units; – The expected emissions to the environment during each of the stages of commissioning; – The mitigation measures that will be taken in respect of emissions to the environment during each stage; – The expected duration of commissioning activities; – Any additional (beyond that required by the Permit) monitoring to be undertaken; – Proposals for the monthly reporting of progress to the Environment Agency; – A noise impact assessment as regards the test running of equipment during the commissioning phase where there is considered to be a necessity to run individual items for short periods without full noise control mitigation measures in place. The Assessment shall evaluate the appropriateness of applying temporary attenuators to any venting activities undertaken as part of the purging of pipework and equipment before normal duty operation. The Assessment shall also detail how commissioning activities will be scheduled such that the potential impact on sensitive receptors is minimised; and – Proposals for the undertaking of a noise survey to assess the impact of the Installation during commissioning and the comparison of measured data against the information supplied in Chapter 2 of Part 2 of Volume 2 of the Application. The proposals shall also detail the methods to be used for the assessment of tonal noise at sensitive receptors. Commissioning shall be carried out in accordance with the commissioning plan as approved.	Complete
PO2	Prior to the operation of the Installation a written accident management plan shall be developed in line with Environment Agency guidance and submitted to the Environment Agency at the Reporting Address.	Complete
PO3	Prior to the operation of the Installation written proposals for the provision of an acoustic screen for the cooling water pumps which delivers the reduction in noise emission specified in section 3.2.1 of the Supplementary BAT Assessment dated May 2011, reference number ENV/474/2011, which was submitted to the Environment Agency on 09/05/11, shall be submitted to the Environment Agency at the Reporting Address for approval.	Complete
PO4	Prior to the discharge taking place of effluent from emission point W1 to which heat or any substance has been added by the Installation, the Operator shall: (a) Submit to the Environment Agency for approval a written programme for monitoring in the Pembrokeshire Marine SAC. The Programme shall include proposals for establishing baseline environmental information prior to operation of the Installation against which any effect of the Installation can be assessed and proposals for ongoing monitoring during the subsistence of this Permit. The Programme shall propose monitoring methods to determine the physical, chemical and biological characteristics of the area that could be	Complete

	affected by the effluent, monitoring locations and frequencies and a procedure for assessing any effect and reporting the results of the monitoring and assessment to the Environment Agency; (b) Obtain the baseline environmental information in accordance with the Environment Agency's written approval; and (c) Submit to the Environment Agency for approval written proposals for the monitoring of chlorination by-products. The Programme shall propose monitoring methods, locations and frequencies together with a procedure for the reporting of results of the monitoring to the Environment Agency.	
--	--	--

Objective 3 – To review the provision for oil and chemical storage on site in the main turbine halls.

During this part of the audit 3 out of the 5 turbine halls were visited against the provisions outlined in the agreed operating techniques for the storage of chemicals in this part of the site.

Table S1.2 entitled Operating Techniques in the environmental permit references Table 3.6 'Details of oil and chemicals stored in the main turbine halls' as outlined in the 'Revised Chapter 3 of Part 2 of Volume 2' of the application submission. For ease of reference this has been replicated below:

Table 3.6 Details of oil and chemicals stored in main turbine halls

Tank no.	Description	Material stored	Volume of tank	Volume usually stored	Bunding arrangements	Pipework arrangement
11	Cleaning agents - gas turbine compressor blade wash detergent.	TBA (proprietary agent)	TBA	Up to 3500 litres	Bunded	HDPE
12	Hydrazine	3-5% w/w	2x1m ³ IBC per unit	Up to 10m ³	Stored in kerbed area capable of holding at least 110% of the volume of an IBC	HDPE

Tank no.	Description	Material stored	Volume of tank	Volume usually stored	Bunding arrangements	Pipework arrangement
13	Tri Sodium Phosphate	Up to 5% w/w	2x1m ³ IBC per unit	Up to 10m ³	Stored in kerbed area capable of holding at least 110% of the volume of an IBC	HDPE
14	Ammonia	3-5% w/w	2x1m ³ IBC per unit	Up to 10m ³	Stored in kerbed area capable of holding at least 110% of the volume of an IBC	HDPE
15	Sodium hydroxide	3-5% w/w	2x1m ³ IBC per unit	Up to 10m ³	Stored in kerbed area capable of holding at least 110% of the volume of an IBC	HDPE
16	Lube oil, power oil, and jacking oil, Steel tank integrated into pump skid.	Oil	5x32m ³	160m ³	Concrete bunding, sized to contain 110% of contents of each tank	HDPE

Details of Oil and Chemicals in the Turbine Halls

The review identified that table 3.6 contained Hydrazine and Tri Sodium Phosphate which are not chemicals currently used and stored on site. The operator explained that this was the proposed list of chemicals presented during permitting however the operator wishes these to remain in the table as they may be used in the future. It was recommended therefore that an inventory that reflects the chemicals present in the turbine halls is linked from the agreed operating techniques to the sites EMS.

Recommendation: Operator to maintain an up to date inventory in the sites EMS of the chemicals currently used on site which links to the agreed operating techniques and table 3.6 and agreed by the environmental permit.

The operator outlined how all IBC stations in the turbine halls have a duty and a standby configuration. As the duty IBC is emptied the standby is put into service and a new one is issued from 'Stores' as a replacement. This is outlined in the sites local procedure 'Ordering and Issue of Process Chemicals' LP No. PEB/LP/ENV/3110 and demonstrated on site by the operator.

A discussion was held over the ordering and availability of chemicals on site and the operator explained that a conservative approach is taken, this is also reflected in the local procedure under the subtitle Safety, Environment and Quality. This was considered to be good practice to prevent the build-up of chemicals on site which can pose a greater risk to the environment. Furthermore the operator outlined that the movement of chemicals around the site is carefully managed, although training was not visited as part of this audit it was touched on briefly in that only trained staff were able to undertake such role and if an IBC is being moved over a longer distance it will need to be secured to a flatbed vehicle rather than transported using a forklift truck. It is proposed that training for the handling of chemicals is visited in a future audit.

During the on-site inspection which focused on the areas visited by the audit it was noted that the housekeeping was very good and in particular at the IBC stations in the turbine halls. There were no additions of chemicals present outside of the agreed operating techniques linked to the environmental permit. From the randomly selected 3 of the 5 turbine halls, units 21, 31 and 41 were visited incorporating 2 where the 'C' inspections were complete and 1 yet to be undertaken. There was some additional activity on-going in unit 41 with the storage of items by the Alstom contractors for the C inspection that was being carried out on unit 51. All 3 turbine halls presented IBC's on dedicated 'sump pallets' and those in service were also within a dedicated concrete bund area providing additional containment in the event of a spill. A spill kit was also readily available at all the IBC stations and an inventory of the contents was present beneath the lid directing a staff member to the appropriate 'Stores' bin where replacements can be sought.



On site chemical Store – Secondary Containment

The operator outlined the provision for the storage of chemicals on site and was able to demonstrate in their Environment Management System (EMS) that this activity has been identified as part of the significant aspect register.

Prior to visiting the turbine halls the operator outlined the provision for chemical and oil storage on site. In addition to the bulk storage tanks which were visited in part during the last audit, there is a main chemical storage unit for Integrated Bulk Containers (IBC)'s and smaller process chemicals in cans and drums located outside the 'Stores' building.



The photographs above were taken of the external racking or secondary containment on site for the storage of IBC's, drums and smaller containers of process chemicals. On inspection there were 2 external storage containers located outside the 'Stores' building. In this location a discussion was held with the operator on the proximity of the nearest surface water drain which although difficult to see in the right hand picture was in front of the triangular road sign. The following guidance provides advice on the location of chemical storage to both watercourses (recommendation of 10 m) and surface water drains (consider use of removable drain covers during delivery).

Pollution Prevention Guidelines on the safe storage of drums and IBC's can be found using the following link for further advice:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/290121/pmho0511btpg-e-e.pdf

(Please note that during the writing of this CAR the Environment Agency no longer provides 'good practice' guidance. <https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg> However Pollution prevention guidance notes (PPGs) that provide good practice are still available as an information source on the [National Archives](#).)

The operator explained that pollution prevention materials are kept within the 'Stores' building so absorbent materials and covers for drains would be sought from here in the event of a spill. A brief visit to the 'Stores' found drain mats and other pollution prevention items on a bottom shelf not far from the entrance there was also a pile of absorbent booms behind the door (photograph below left). Some chemicals had also been stored on the racking however one container was on its side (middle photograph) which could increase the risk of it leaking. It was noted that the nearest drain was within the floor of the building within close proximity to the chemicals on the rack.



It was recommended that dedicated spill kits would be beneficial in this location for use within the 'Stores' and outside by the chemical store. Although the absorbent materials were present in the store in the event of a spill it was considered that you would not want to be trying to locate various items within the racking during an incident.

Recommendation: Operator to consider dedicated spill kits in the location of the chemical store and 'Stores' building for easy access and use in the event of a spill. It is also worth considering the use of a drain cover during deliveries and handling of chemicals over the surface water drain located nearest the store.

A brief discussion was held during the on – site inspection concerning the contained drainage system and its management on site. A visual inspection was also undertaken of the final sump which is controlled by pumps and sluice gates. In the event of a spill on site the operator has full control of the drainage system by means of opening and shutting the sluice gates both automatically and manually to eliminate and reduce any risk to the environment. This was not explored further in this visit and it is proposed that the management procedures in respect of this will be visited in a future audit.

Industrial Emissions Directive (IED) Large Combustion Plant Directive (LCP) Permit Variation

During this audit an update was provided on the progress of the permit variation to implement the requirements of Chapter III of the IED. During the time of writing the consolidated permit variation was issued to the operator on 22 December 2015.

AOB

Marine Licence Concerning the Boom on the Intake

A discussion was held on the requirement to take photographs for inspection by NRW of the boom on the intake. A marine licence was applied for and issued for the installation of the boom. This licence expired in February 2015 following the completion of the work it is considered therefore that the requirement is no longer required. The operator has a maintenance procedure in respect of the boom and it was recommended that the operator manages the need for such surveillance of the boom within this document.

Recommendation: Operator to review the document associated with the boom on the intake to ensure it is up to date following the expiration of the marine licence for its installation.

Conclusion

No breaches of the environmental permit were identified in the areas visited by this audit. The audit sought to gain updates on on-going matters relating to the first major shut down or 'C' inspections and the foam reduction project. A review of the preoperational and improvement conditions was also undertaken with the operator as a timely exercise prior to issue of the NRW permit variation to implement Chapter III of the IED. Furthermore an in-depth audit approach was taken in respect of permit condition 2.3 and in particular the storage of chemicals and oils in the turbine halls linked to table S1.2 Operating Techniques. No specified actions arose from the audit but some recommendations have been made in respect of the areas visited. All recommendations been consolidated in the table at the end of this Compliance Assessment Report (CAR). Communications with the operator are good both with the regulator and local community who routinely gain updates on work relating to the site through the sites LLC.

End

	EPR Compliance Assessment Report	Report ID: 6001
This form will report non-compliance with your permit as determined by an NRW officer		
Site	Pembroke Power Station	Permit DP3333TA
Operator/ Permit	RWE Generation UK Plc	Date 23 December 2015

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			
-	-	Recommendation: Operator to maintain an up to date inventory in the sites EMS of the chemicals currently used on site which links to the agreed operating techniques and table 3.6 and agreed by the environmental permit.	N/A
-	-	Recommendation: Operator to consider dedicated spill kits in the location of the chemical store and 'Stores' building for easy access and use in the event of a spill. It is also worth considering the use of a drain cover during deliveries and handling of chemicals over the surface water drain located nearest the store.	N/A
-	-	Recommendation: Operator to review the document associated with the boom on the intake to ensure it is up to date following the expiration of the marine licence for its installation.	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**.