

Compliance Assessment Report

Report ID:
CAR_NRW0032823

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

Site	St Asaph EPR/BX4666IZ	Permit Ref	BX4666IZ		
Operator/Permit holder	Qioptic Ltd				
Regime	Installations				
Date of assessment	31/12/2017	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	2017 Returns				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	Huw Williams/ Site Services Manager	Date issued	13/02/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

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

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Review of monitoring and annual returns data to satisfy reporting conditions of Permit BX46661Z:

Emissions to Air

Monitoring data for emissions to air for particulate matter from emissions points A2, A5, A7 and A10. A11 for VOC.

Noted that all emissions are below specified ELVs.

Specified metals also monitored and annual mass emissions calculated. No ELVs set for metals, annual mass emissions calculated by site show that the emissions of these metals is still to be considered insignificant.

Energy Usage

Energy usage figures reviewed - no significant increases from previous years.

Water Usage

Mains water usage has increased from 260 m³/year in 2016 to 383 m³/year in 2017. Specific usage more than doubled from 0.04 m³/unit output in 2016 to 0.09 m³/unit output in 2017.

Please provide NRW with an explanation for this increase.

Waste Recovery and Disposal

Waste recovery and disposal figures reviewed - no significant increases from previous years.

Solvent Management Plan (SMP)

Permit condition 4.1.2 requires a report in respect of the performance parameters and reporting periods as specified in Table S4.1 to Schedule 4, i.e. a Solvent Report every 12 months (period begins 1 January, each year).

Please provide your Solvent Report for 2017.

Review of actions to satisfy the requirements of CAR_NRW0032504:

Action 1 - Please forward to NRW a procedure to cover all aspects of monitoring, by 31st of January 2018.

Procedure SHE-26 was received on the 25th of January. The suitability of this procedure will be assessed during future site audits.

Action 2 - OMA & MCERTS awareness training is recommended for the Environmental and COSHH Engineer responsible for management and monitoring of emissions to air.

It is understood that a new Environmental and COSHH Engineer has just be employed. This actions still stands, if required.

Action 3 - The Operator should review the monitoring access ports and provisions against the requirements of M1 and instigate a programme of improvements where required. Please forwards a summary of findings to NRW by the 31st of January 2018.

You confirmed on the 25th of January, that the tape of the emission access ports have now been replaced by rubber grommets. The suitability of the access ports will be assess again during future site audits.

Action 4 - The Operator should seek permission from NRW if monitoring methods required are to be changed.

This action still stands, and should be undertaken if required.

Action 5 - Auditing plans and procedures at the site should be expanded to include monitoring. Such audits should be documented.

The completion of the this action will be assessed during future site audits.

EPR Compliance Assessment Report

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Operator/Permit holder	Qioptic Ltd	Date	31/12/2017

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.