

Compliance Assessment Report

Report ID:
CAR_NRW0026696

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

Site	J Reid Trading Ltd EPR/MP3531MD/V003	Permit Ref	MP3531MD			
Operator/Permit holder	J REID TRADING LIMITED					
Regime	Installations					
Date of assessment	17/11/2016	Time in	10:00	Out	12:30	
Assessment type	Audit					
Parts of the permit assessed	Permitted activity, site operations,storage and segregation, amenity impacts					
Lead officer's name	McGregor-Andrew, Sian					
Accompanied by	Oakes, Ian					
Recipient's name/position	Paul Leadbetter/ Technical Manager	Date issued	23/11/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
E2 - Emissions - Land and groundwater	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F5 - Amenity - Deposits on road	A	

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

Site inspection and operational update:

The site was tidy and there was clear segregation of incoming and outgoing materials from the transfer operation area. The impermeable surfacing appeared to be in good condition and traffic requiring access through the site continues to be managed via the two barriers at the site entry and egress points.

The surface water interceptor manhole beneath the incoming waste storage area is checked every few months for evidence of build-up of oils and sludges, or other contamination.

Empty and redundant but re-useable containers awaiting collection are currently being stored on land adjacent to the site by agreement with J Chadwicks who operate a permitted scrap metal recycling business in the local area. These cylinders are the property of Mexichem UK Ltd.

Activities at the site have not changed since the previous inspection so the DSEAR zoning for the site has not changed (currently Zone 2).

Discussions have recently taken place with the LPGA and BCGA asset managers regarding the repatriation of orphaned LPG cylinders.

There have been changes in occupancy of the neighbouring business units, please update the site plan to reflect this and consider any impact this might have on the site environmental risk assessment.

Proposal to process Acetylene cylinders:

We would like to further explore your proposal to process nominally empty end-of-life acetylene cylinders on site, such as mid-section welded cylinders as superseded by the non-welded integral design. Prior to any such activity commencing NRW request further details to ensure the operation is consistent with current permit requirements and minimises risk to the environment.

Please provide the following information:

- Detailed acceptance and rejection criteria for the nominally empty acetylene cylinders, including confirmation of the anticipated size and type of cylinders to be processed, how the type of matrix and solvent they contain will be identified and how you will assess and manage the remaining acetylene content and ensure no potential for detonation prior to and during processing.
- Confirm the maximum quantities you anticipate holding on site prior to processing and the maximum processing capacity for acetylene.
- An updated site plan indicating the proposed storage and handling arrangements for the cylinders and the extracted acetone.
- Confirm the anticipated turnaround times from receipt to dispatch of the cylinders for disposal
- Details of the fate of the sealed cylinders, any residual acetylene and the extracted acetone.

In addition you should revisit the following site documents as a minimum to ensure the proposed operations are adequately considered:

- Site environmental risk assessment
- Accident management plan
- Site working plan

The current permit does not specifically cover the storage of liquids in drums or contain reference to the waste code

you have specified for the processed cylinders containing the asbestos matrix (15 01 11).

Following submission of further information we will advise as to any permitting implications.

A copy of the following documents from our records are attached for review:

- Word and pdf copies of the site plan
- Site environmental risk assessment
- Accident management plan
- Site working plan

I also attach a link to the HSE Guidance for information: HSG51 Storage of Flammable Liquids in Containers (<http://www.hse.gov.uk/pUbns/priced/hsg51.pdf>)

EPR Compliance Assessment Report

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Operator/Permit holder	J REID TRADING LIMITED	Date	17/11/2016

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 reports 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 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.