Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: 30173/0240656

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

Site	Longlife Spares			Permit Ref	30173		
Operator/ Permit holder	Zaccaria Marcello						
Date	29/05/2015			Time in	10:45	Out	11:30
What parts of the permit were assessed	All						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	Tahir Karim						
Officer's name	Geraint Richards, Adam Ward			Date issued	05/06/2015		

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	C3		D5
	2. Closure & decommissioning	NA		
	3. Site drainage engineering (clean & foul)	N		
	4. Containment of stored materials	C3		E23
	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	C3		E10 and E11
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	A		
	2. Noise	A		
	3. Dust/fibres/particulates	A		
	4. Pests, birds & scavengers	A		
	5. Deposits on road	A		
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	NA		
	2. Energy	NA		

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

Number of breaches recorded	3	**Total compliance score** (see section 5 for scoring scheme)	12

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 report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Introduction

This inspection was conducted to handover the site from Adam Ward to Geraint Richards, the new regulator.
There was heavy rain on the morning of the inspection.

Observations

A large number of vehicles were present on site, including in the roadway entrance and at the rear, which may begin to pose a problem for managing the site if things are not improved. Many of these ELVs appeared to be undepolluted and need to be stored appropriately.

Significant amounts of oil had accumulated in the bunded sections of the depollution area, and there was an accumulation of surface water in the bunds which will need to be addressed.

Thank you for providing a copy of the site Environment Management System (EMS). This will be audited in a separate form and comments will be sent to you.

Ashley Griffiths is now the Technically Competent Manager of the site, please ensure he attends site as required by the Permit. You should keep a copy of Ashley's original WAMITAB Certificate including any Continuing Competency on record. As TCM, he must attend site and has responsibility for ensuring the site is fully compliant with permit conditions.

I understand that Marcello Zaccaria is looking to transfer the permit to you. As he is the current permit holder, you should transfer this as soon as possible. Please contact me should you need any advice.

Breaches

As with previous inspections, a number of issues need to be addressed and these have been noted below, along with the relevant permit condition and the actions you need to carry out.

B1) Infrastructure - Engineering for Prevention and Control of Pollution - Category 3 breach
Permit Condition D5 -The permit requires you to 'maintain the yard surface to the 'satisfaction of the Waste Regulation Authority'. There are areas of the yard which have rutted and are pooling with oily mud and water and do not appear to provide the environmental protection required. These areas need resurfacing and the contamination must be dealt with.

C4) Management - Storage, Handling, Labelling & Segregation - Category 3 breach
Permit Condition E10 - A number of undepolluted ELVs were being stored outside the correct areas. You are required to store all incoming ELVs in the dismantling area on an impermeable surface with sealed drainage, this is to ensure that no fluids can leak and cause pollution from these ELVs. Only vehicles that have been fully depolluted can be stored on hardstanding. You must remove vehicles from these areas or extend the infrastructure to contain them.
Permit Condition E11 – You are required to drain all vehicles or other equipment containing liquids on the dismantling area only, as shown in the working plan. There are currently a number of vehicles that have not been drained in the dismantling area which are being stored on hardstanding and unmade ground.

B4) Infrastructure - Containment of stored materials - Category 3 breach
Permit Condition E23 - You are required to keep bunds clear of accumulated surface water and spills to allow these areas to contain any leaks or major spills. Please ensure these areas are cleaned and the water removed and disposed of appropriately.

Summary

These issues have been noted on a number of previous inspections and I am concerned that improvement is not occurring on the site. In particular, the storage of undepolluted ELV's on unsuitable hardstanding and unmade ground poses a risk to surface water and groundwater. Please address this as a matter of urgency as if this non-compliance continues, I will have to consider what enforcement action is required.

Please contact Geraint Richards on 03000 653482 or email on geraint.richards@cyfoethnaturiolcymru.gov.uk if you have any queries.

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

Section 4- Action(s)

Where 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			
B1	C3	Improve infrastructure	N/A
B4	C3	Remove water/contaminated water from bunds	N/A
C4	C3	Store ELVs correctly	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 the Natural Resources Wales (NRW) to fulfill 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 (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.

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 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 607 0987.