Compliance Assessment Report CAR_NRW0042907

Permit being assessed: DP3399FJ.
For: Safetykleen UK Ltd, held by Safety Kleen U K Ltd
At: Unit 4, Springmeadow Road, Springmeadow Business Park, Rumney, Cardiff, CF3 2ES.

Type of assessment carried out: Site Inspection, Reason: Routine.
On 18/09/2023 between 11:00 and 11:40.
Parts of permit assessed: All

NRW Lead Officer: Amy Bailey, accompanied by Craig Coleman.
Report sent to: Tim Cokyucel, TCM on 30/11/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C2	Please update your EMS in line with the 'how to comply with your environmental permit' guidance. Please submit your updated EMS to NRW within three months.	29/02/2024
C4	Please improve the labelling system as discussed and provide photographic evidence to NRW within 14 working days.	14/12/2023

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Introduction

Waste Regulation Officer Amy Bailey and Hazardous Waste Regulation Officer Craig Coleman met with the sites Facilities and Compliance expert Tim Cokyucel. The visit was a pre-arranged site inspection of the bespoke permit EPR/DP3399FJ, dated 1992 which has been subject to 10 variations.

Throughout the duration of the inspection the weather was sunny and dry.

This was Amy Bailey's first visit to site and so a walking tour of the facility was undertaken as well as a site inspection to assess compliance of the waste stored on site.

Site Activities

The permit allows for the storage and bulk treatment for onward treatment/disposal of hazardous and non-hazardous wastes.

Permit table S2.2 limits the quantity of waste to be accepted to the site as 5,000 tonnes per year.

Table 2.2 Permitted waste types and quantities	
Maximum quantity	The maximum quantity of waste to be accepted on site shall not exceed 5,000 tonnes per year.

Tim informed officers that at the time of inspection there was a higher quantity of waste oil than usual on site, waiting for collection. The amount of waste oil was well within accepted quantity and a permitted waste type. Volume and storage duration was also in compliance with the sites Fire Prevention Mitigation Plan (FPMP).

Site Infrastructure

The building is bunded including all doorways and entrance points. The impermeable surface of the building was complete and in good condition.

Officers were able to easily identify three spill kits on the premises and Tim advised that all Safetykleen vehicles that bring waste to the depot have spill kits on board.

Flammable wastes are stored within a double level hazmat container which was in good condition. Other wastes on site were well segregated and stored, however officers noted that not all bays or waste containers were labelled. Tim informed officers that they were in the process of implementing a magnetic labelling system.

Action- ***please improve the labelling system as discussed and provide photographic evidence to NRW within 14 working days.***

Interceptor

Tim informed officers that the interceptor is regularly emptied and inspected. Following the visit officers were sent an invoice for the emptying of the interceptor dated 3.11.22.

Environmental Management System (EMS)

I note that your Environmental Management System (EMS) does not include information relating to the inspection and maintenance of your interceptor system. Your EMS needs to be produced in line with the 'How to comply with your environmental permit' guidance, which specifies your EMS should 'have an inspection and maintenance programme for impervious surfaces and containment facilities.

Action- Please update your EMS in line with the 'how to comply with your environmental permit' guidance. Please submit your updated EMS to NRW within three months.

Waste Returns

Waste returns have been submitted for Quarter 3 and are up to date.

Technically Competent Manager (TCM)

The site is EU Skills accredited, with recertification due on 12th Jun 2024.

Fire Prevention and Mitigation Plan (FPMP)

Permit condition 43.1.1 states 'The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.'

The most recent FPMP we had on file was dated 2018. Following the site visit Tim has provided the 2023 version of the FPMP. This has not been reviewed by NRW at this time but will be in due course. In the meantime NRW expects the site to be operated in compliance with any FPMP's and in accordance with the FPMP guidance.

Summary

Overall, it was noted that the site was very well organised with general housekeeping of a good standard. Copies of the permit, Environment Management System and other paperwork was readily available and kept in an orderly manner.

Thank you for your time.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Amy Bailey on 0300 065 3000, or via email at

Amy.bailey@naturalresourceswales.gov.uk

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities
- A1 Specified by permit

B: Infrastructure
- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management
- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management
- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions
- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity
- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting
- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency
- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response
Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice
You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line
If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?
If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards
We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.