

Compliance Assessment Report

Report ID:
CAR_NRW0033904

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

Site	Supply from spring at Cwm	Permit Ref	20/56/64/0030			
Operator/Permit holder	Silent Valley Waste Services Limited					
Regime	Water Abstraction					
Date of assessment	30/08/2018	Time in	11:00	Out	14:30	
Assessment type	Check Monitoring/Sampling					
Parts of the permit assessed	All					
Lead officer's name	Burton, Luke					
Accompanied by	Ward, Tyrone					
Recipient's name/position	Noel Chard / Manager	Date issued	07/09/2018			

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
C2 - General Management - Management system and operating procedures	C3 - Suspended	9
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	C3 - Suspended	9
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	2	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

Environment Officer Luke Burton and Pollution Prevention Control Officer Tyrone Ward met with Noel Chard of Silent Valley Waste Services Limited.

Throughout the duration of the inspection the weather was bright and dry. The inspection was following a summer of very low rainfall in which Wales went into a 'developing drought' period.

Summary of abstraction

Silent Valley Waste Services Limited abstracts water at approximate national grid reference SO 18160734 by means of an underground chamber which collects water emanating from an underground spring. The chamber has three outlets. One outlet flows via gravity to a second chamber which flows via gravity down a pipe to a pump house at the waste transfer station (environmental permit: EPR/MP3895FT). The second outlet flows via gravity down a pipe to a water storage tank near the site offices. Water abstracted is used for cleaning food waste containers ('pods') and welfare facilities at the transfer station, and, welfare facilities at the site offices. The third outlet is an overflow, via a stone lined channel, to a nearby pond.

Means of measurement of water abstracted

As per condition 8 of the licence, a meter shall be used to measure the quantities of water abstracted. A meter is present along the gravity fed pipe feeding the site offices. The pumping station has two pumps and two meters – one supplies the water used for the washing of food containers ('pods') and the other supplies the welfare facilities at the transfer station, respectively.

Gravity fed pipe feeding the site offices: The meter is accessed via a manhole cover and located along a straight, rigid length of pipe within the manhole chamber. The meter appears to be placed 10x the diameter of the pipe downstream of a bend and 5x the diameter upstream of a bend. The meter's flow indicator was turning. Visibly the meter looked to be in a well-maintained condition. At the time of the inspection the meter register read 001652-3 cubic meters.

Meters in pumping house: The meters are located within a pump house. The pump house features a water storage tank, duty and standby ultra-violet treatment systems, and a duty and standby pump and a duty and standby meter. Both meters are located along a straight, rigid length of pipe. Both meters appear to be placed 10x the diameter of the pipe downstream of a bend and 5x the diameter upstream of a bend. The one meter's flow indicator was turning. Visibly the one meter looked to be in a well-maintained condition (observation window clear and sealed). The other meter's observation window was obscured internally by condensation. At the time of the inspection the unobscured meter register read 000038 cubic meters.

ACTION 1: Please service the obscured meter in the pumping house so that the observation window is no longer obscured.

As per condition 8 of the licence, the meter should be calibrated regularly in accordance with the recommendations of the manufacturer.

ACTION 2: Please provide records which demonstrate that all three meters have been calibrated.

Quantities of water abstracted

As per condition 7 the maximum quantity of water to be abstracted during the specified period is 6,158 cubic meters per year.

The records of meter readings you have provided for the gravity fed pipe feeding the site offices show the

following quantities of water have been abstracted annually:

Year	Total quantity of water abstracted (cubic meters)
2013 (new meter installed on 17/04/13)	189
2014	283
2015	101
2016	157
2017	401
2018 (to 15/08/18)	483

ACTION 3: No meter readings have been taken for the meters in the pumping house serving the transfer station. Please ensure readings are taken and recorded weekly, at the same time each week, for both meters. Given the pump house only came on line earlier this year we agree you should accurately be able to confirm the total annual abstraction at the transfer station come 31st Dec 2018.

ACTION 4: Please investigate why the water usage has increased from 2017 onwards i.e. is there leak at some point between the abstraction and use points. As agreed you will arrange to take some more frequent readings over the coming weeks to confirm meter readings tie up with estimated usage; to discount the possibility of any leaks

Records

As per condition 9 of the licence, meter readings shall be taken and recorded at the same time each week. Meter reading records provided show that readings are not being taken every week and it was noted that this may be due to unsuitable staff coverage.

ACTION 5: Please confirm how you will ensure that suitable staff resource is provided every week to ensure that the meter reading is taken.

As per condition 9 of the licence a copy of the record of summary data shall be sent to [Natural Resources Wales] within 14 days of being so directed in writing by [Natural Resources Wales].

ACTION 6: As mentioned Natural Resources Wales has experienced issues running our abstraction return data collection programme. As such we haven't requested data for the periods 2016-2017 and 2017-2018. Hopefully at some point this Autumn you will be contacted by Natural Resources Wales and asked to submit your returns data for these periods via post or email. Apologies for any confusion this has caused. Please ensure that your contact details are the same as those provided for the period 2015-2016. If they are not please contact the Water Resources Permitting Team to update your contact details via email or post: permitting@naturalresourceswales.gov.uk , or, Water Resources Permitting Team, Ty Cambria, 29 Newport Road, Cardiff, CF24 0TP

Note: Please be reminded that you should use the water abstracted under the terms of this licence in an efficient manner. Please take this opportunity to review water usage across your whole site.

EPR Compliance Assessment Report

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Operator/Permit holder	Silent Valley Waste Services Limited	Date	30/08/2018

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.

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.

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			
C2	C3	Please confirm how you will ensure that suitable staff resource is provided every week to ensure that the meter reading is taken.	21/09/2018
G2	C3	Begin taking weekly meter readings.	14/09/2018

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.