

Compliance Assessment Report

Report ID:
CAR_NRW0035945

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

Site	Rear of Unit 7	Permit Ref	PB3530RJ		
Operator/Permit holder	S B S Salvage Limited				
Regime	Waste Operations				
Date of assessment	07/11/2019	Time in	10:30	Out	11:15
Assessment type	Site Inspection				
Parts of the permit assessed	A, B, C, F and G				
Lead officer's name	Bowder, Alex				
Accompanied by					
Recipient's name/position	Kayeed Ahmed, Gareth Danter-Hill/ Director. TCM	Date issued	12/11/2019		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	X	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Officer Alex BOWDER attended SBS Salvage Ltd, Cardiff Road East, Barry CF63 2QN at 10:30 on Thursday 07 November 2019 to carry out a routine inspection of permit **EPR-PB3530RJ**. Met with business Director Mr. Kayed AHMED and Environmental Focus Consultant Gareth DANTER-HILL who accompanied the Officer around the yard and explained the business processes. Weather conditions were slightly wet at the time of visit.

GENERAL OBSERVATIONS

The housekeeping on site concerning vehicle storage and treatment was very organised. The addition of the extra yard space has afforded the site more room for manoeuvre which has optimised efficiency.

Vehicles were stacked no more than two high across the permitted area. A new depollution bay has been installed to the left of the original depollution zone. Suitable infrastructure -vehicles are punctured and left to drain via gravity. This new area must be updated in the Site Plan.

The business has submitted a permit application for a similar ELV activity at another yard in the Barry area. The intention is to primarily operate at the new yard and keep the current permitted yard active for storage purposes.

PERMIT SURRENDER

The business discussed the possibility of surrendering part of the permitted area in the future. This would be classed as partial surrender - further details can be found on our website:

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/apply-to-surrender-a-waste-permit/?lang=en>

In summary, to apply for the partial surrender of the permit you would be required to:

- Complete a Site Condition Report (SCR) – see website for further details
- Provide a general overview and summary from the CAR Forms to show record of no pollution
- Outline the area that you are requesting to surrender
- Include photos to show that the site is in a good condition and not contaminated in any way
- Give a detailed site plan and clear the yard of any waste and litter.

Tyres are stored in two/three different areas of the yard. They are then transported to an appropriate contractor when volume is high enough. Removed engine batteries were stored in an appropriate sealed

container.

The newly permitted area was being used for storage of vehicles ready for depollution. The site spoke about the intention to install a depollution bay last inspection; this has since changed. No depolluting of vehicles was taking place in this area.

INFRASTRUCTURE AND DRAINAGE

The site interceptor was easily accessible and was said to be emptied in the last month. No issues were apparent with the system at the time of inspection. There were no fractures or weakened areas noted in the yard surface.

It was again good to see use of sawdust material to absorb spills and residual oil patches on the yard surface from stored engines. Oil-soaked sawdust is cleaned up, stored in an appropriate container and taken away by a contractor.

ENVIRONMENT MANAGEMENT SYSTEM (EMS)

Gareth would be working on a new document for the new site - it was mentioned that the Plan for the current site could be updated at the same time.

The Fire Prevention and Mitigation Plan (FPMP) document is in place and being implemented across the site.

ADVISORY NOTE - Engine storage

Once engines have been depolluted, the units are stored on the yard surface next to the original depollution bay. The Officer again raised the drainage containment point of the storage area in times of heavy rainfall. The Operator spoke about the slope gradient of the slab that prevents run-off from leaving the site onto the greenery that the site borders. It was stated that there is quick turn-around time of the material and so the engines are not stored for prolonged periods of time. No evidence of run-off leaving site.

Please ensure all run-off is contained on the slab and everything is captured by the drainage system.

WASTE RETURN DOCUMENTS

The business stated it is submitting Hazardous Waste Returns for oils etc. Extracted diesels are re-used in the machinery on site. The business submitted its annual Waste Return document for 2018 on 07/03/19. Next return document due January 2020.

No breaches were recorded on this inspection.

If you have any issues with this report, please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

EPR Compliance Assessment Report

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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			
C2	X	Update Site Plan to reflect changes in work areas	12/01/2020

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.