

Compliance Assessment Report

Report ID:
CAR_NRW0035988

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

Site	Safetykleen UK Ltd	Permit Ref	DP3399FJ		
Operator/Permit holder	Safety Kleen U K Ltd				
Regime	Waste Operations				
Date of assessment	15/11/2019	Time in	10:00	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	waste acceptance, staroage. staff training. record keeping				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Tim Cokyuce/ Customer services team leader and competent manager	Date issued	26/11/2019		

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
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	A	
C3 - General Management - Materials acceptance	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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

This Compliance Assessment Report (CAR) form has been completed following the site inspection undertaken on the 15th November 2019 of the Cardiff Safetykleen site, permit number EPR –DP3399FJ

The inspection was planned and pre-arranged. Ffion Thomas met with Tim Cokyucel Customer services team leader and competent manager, who accompanied during the inspection.

The permit allows for the stage and bulk treatment for onward treatment/disposal of wastes and hazardous wastes. All activities take place within a building.

The original permit is dated 1992 and has been subject to 9 variations.

Whilst not discussed on site during the time of the inspection on reflection Ffion Thomas is minded to enquiring internally as to NRW's ability to consolidate the permit into a modern EPR template, which would result in 1 permit with the past variations included and modern permit conditions reflecting the activities on site against modern environmental protective standards.

Further discussion on any modernisation of the permit can be held following confirmation if NRW would have the resources to undertake the work internally.

Site walk over:

This was the first time Ffion Thomas had visited the site and so a walk over tour of operations was provided. During this site walkover Ffion was able to inspect the waste activities on site, segregations and storage arrangements, and drainage infrastructure were checked.

Incoming waste are by arrangement only and subject to pre-acceptance procedures (paper work checked and discussed later) Wastes are stored within the bunded building, in designated area/tanks and segregated dependant on their waste type.

As the building is bunded there are no internal drains. The impermeable surface of the building was complete and in excellent condition with no viable wear. All door/entrances are bunded. There are also 2 spill kits on site and all the Safetykleen vehicles that bring waste to the depot have spill kits on board.

An adjacent building next door to the waste storage unit is now being used for the storage of Safetykleen vehicles and for plant/equipment. No waste was seen in this unit.

External lockable storage area is only used for empty/clean drums. The storage tanks in this area are empty.

Office based/paperwork inspection:

The site diary includes a full daily inventory of the waste types and quantity stored. The storage tanks have an automated system used to measure levels and so quantity, and is backed up with gauges on the tank too so a physical reading can also be cross checked. The inventory of waste received cross references to the pre-acceptance bookings and the information ties back into the item/product collected by the drivers. A spreadsheet then saves all data as to what is on site at any one time. This is further cross checked by both Tim and Mike Mullins (warehouse person) to ensure the inventory and waste stocks on site tally.

Weekly checks and maintenance checks are also undertaken, including tank inspections. A copy of the last tank inspection was witnessed with no defects identified, tank painting will be undertaken however for visual improvements.

Further to the waste inventory and daily checks an example of a hazardous waste consignment was witnessed. As customer pre-acceptance is undertaken in accordance with Annex 13 of the Working plan. The technical team in the companies Sheffield site will review this information. If accepted the drivers are then provided with the detailed paperwork, which serves both as consignment note and invoice for the company, each customer/load is provided with a QR code and this can be scanned and links back into the customer's account, where the information of the waste, transport, storage and final disposal/recovery is tracked.

One customer has now asked for the exact waste quantity of each drum, and so Safetykleen are now weighing the incoming waste and reporting back exact quantities.

Staff training procedures were inspected. As per the permit requirements for competent managers there are 3 members of staff hold technical competency. Safetykleen run a competent

management system, this is specific to Safetykleen and accredited externally by SafetyHub.

Every 3 months the company undertake internal auditing on all aspects of the business, a full audit is also undertaken by the compliance team yearly.

There is a list of regular training which all staff complete and if required following any issues arising tool box talks are also provided. Staff must sign this training. Examples of training from the management systems were seen including topics covering environmental topics e.g. spill response, environmental monitoring, assessment of acceptance labelling and packaging.

As this was the first inspection Tim had received since being employed discussion was had regards to what the inspection covered and how the CAR form would be produced. An explanation regarding how any non-compliances of permit conditions would be scored and how these related to the site's subsistence fees was provided.

Further to those items discussed below I provide a link to the "how to comply" guidance document as further information and which provides guidance on environmental standards and permit compliance.

<https://cdn.naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf?mode=pad&rnd=131467604540000000>

At the time of this inspection no non compliances were identified. The site is very well run.

Post inspection permit checks:

On return to the NRW office Ffion Thomas was able to find the sites Fire Management Plan saved in archive files. It is noted that in the last permit variation issued in 2018 there was an improvement condition added requiring the submission of a fire plan. This has been complied with. However it was not possible to find on file any confirmation that the Fire prevention mitigation plan had been assessed by NRW against current guidance nor if confirmation had previously been provided by the previous officer (who has now left NRW) of such review.

Unless informed otherwise an assessment of the FPMP will now be undertaken, any comment will be forwarded.

END

EPR Compliance Assessment Report

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Operator/Permit holder	Safety Kleen U K Ltd	Date	15/11/2019

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 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.