

Compliance Assessment Report

Report ID:
CAR_NRW0020647

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

Site	Unit 7	Permit Ref	PB3530RJ			
Operator/Permit holder	S B S Salvage Limited					
Regime	Waste Operations					
Date of assessment	02/06/2016	Time in	11:00	Out	13:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Ward, Adam					
Accompanied by						
Recipient's name/position	Kayed Ahmed/ Director	Date issued	25/10/2018			

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E2 - Emissions - Land and groundwater	A	
E4 - Emissions - Sewer	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

SBS Audit – 2nd June 2016

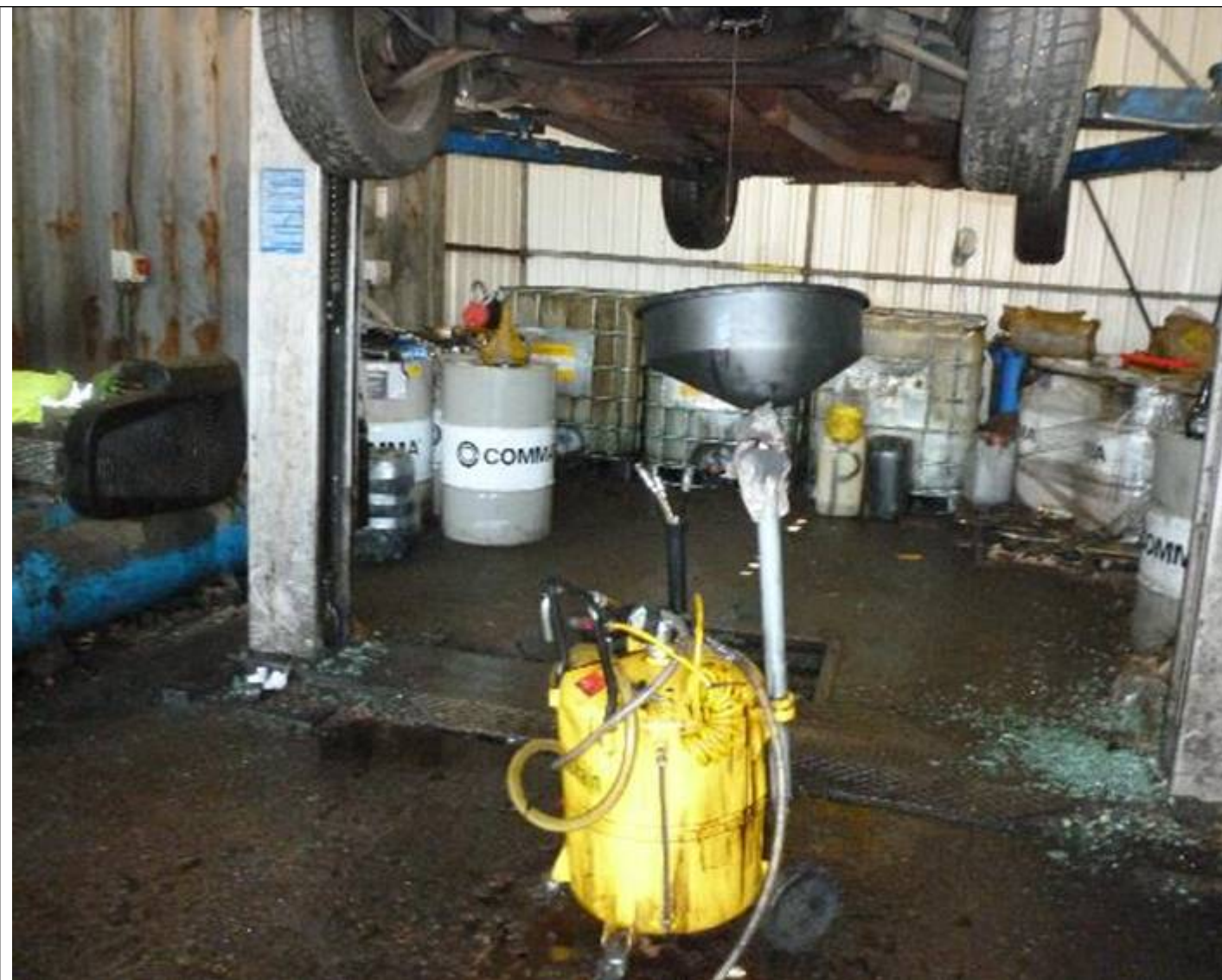
This inspection was conducted by Officer Adam Ward and included the audit of the depollution process and an audit of your duty of care waste transfer notes. Thank you for taking the time to demonstrate the process and your paperwork accordingly.

Depollution Process

The **Depollution Area** benefits from an impermeable surface which is bunded. Any spillages of oil and waste waters drain to a sump in the floor. Please ensure this area is kept as clean as possible and absorbent material is applied as soon as practicable to reduce the risk of emissions beyond the depollution bay.

Upon the arrival of you regulatory officer, you had already begun depolluting a blue, diesel engine Peugeot 206, registration number CF52 KFW. A member of staff had removed the **Lead Acid Battery**, the radiator including the **Water/Coolant** and had begun removing the **Refrigerant** using an appropriate device. The **Air Bag** had been cut open and the wires were cut and removed. It was noted that the explosive component of the air bag is not removed he vehicle or effectively 'deployed'.

[The explosive component is a *hazardous waste* and therefore needs to be consigned (using consignment notes) when changing hands. If the explosive component is left in the vehicle, the entire vehicle shell should be consigned as a hazardous waste.]



The **Engine Oil** sump was drilled, drained into a container and plugged. You then proceeded to cut the drive shaft and remove the **Catalytic Converter** using an *oxy-cutting* device. You confirmed that the Catalytic Converters are being consigned as a hazardous waste in line with new guidance provided by Natural Resources Wales. It was noted by the officer that there were sparks and small metal fires caused by the oxy-cutting device. This was concerning as a number of flammable liquids such as oils and fuels were nearby and the vehicle's fuel tank had not been drained. However, you did explain that the fuel tank is left untouched and undrained on the vehicle as the fuel is safely enclosed and to avoid the risk of fuel vapour being created, which may be higher risk. This activity, including the storage of the flammable liquids, may need to be re-considered to further reduce the risk of fire and explosion.

Next, the oil from the **Shock Absorbers** and **Power Steering** were drained and sucked out respectively. The officer did not witness the complete depollution process but the operator satisfactorily explained that next oil from the **Gear Box** and **Brake Fluid** reservoirs and the **Screen Wash** would be drained so that all hazardous fluids would be removed from the vehicle in compliance with the End of Life Vehicle Directive 2003. All waste oils are stored mixed and waste water (coolant and screen wash) are stored separately inside the depollution area. Fuels are removed from the depollution area and stored in separate containers.

When questioned about the engine **Oil Filter**, you confirmed that you only remove them if the engine is being sold for scrap. It is clear from the inspection that the majority of engines are sold for re-use and therefore the oil filters are left on. All **Oily Rags** are stored safely ready for recycle by Safety Kleen.



Duty of Care

All waste transfer notes and consignment notes were completed to a satisfactory standard and it is evident that you have maintained good records keeping. You may wish to store transfer and consignment notes for each waste fraction in separate folders so that inspections and audits can be more efficient in future.

As outlined above, all hazardous waste must be transferred using a consignment note. If hazardous wastes are mixed with non-hazardous waste, the entire body of waste becomes hazardous. It is therefore important that each hazardous component or liquid is removed in line with the End of Life Vehicle Regulations 2003 and that the waste is consigned in line with The Hazardous Waste Regulations 2005.

Other Comments

It was extremely positive to see that your sealed drainage system, which includes an impermeable surface and an alarmed interceptor, is now connected to the fowl sewer via a DCWW discharge consent. You also intend to further improve the infrastructure by bunding additional areas of the impermeable surface to further reduce the risk of fugitive emission to land and groundwater.



The large stockpile of depolluted vehicles has been significantly reduced since the last inspection. This has improved the capacity and manoeuvrability on site which reduces the risk of non-complaint storage of ELVs and the impact of potential fires.

Overall, the site is very well managed and the ongoing improvements should mean that the compliance banding of the site will improve if you remain compliant with your permit. This will have the added benefit of reducing your annual subsistence fees in future.

If you have any questions regarding this Compliance Assessment Report form, your permit or the DAL, please do not hesitate to contact Adam Ward on 03000 653149 or via email on adam.ward@naturalresourceswales.gov.uk

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EPR Compliance Assessment Report

**Report ID:
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Site	Unit 7	Permit Ref	PB3530RJ
Operator/Permit holder	S B S Salvage Limited	Date	02/06/2016

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.

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.

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.