Compliance Assessment Report

Report ID: CAR_NRW0033316

This form will report compliance with your permit as determined by an NRW officer					
Site	Cole Contractors Cardiff	Permit Ref	UB3397TY		
Operator/Permit holder	Cole Contractors Cardiff Ltd				
Regime	Waste Operations				
Date of assessment	03/05/2018	Time in	14:00	Out	14:50
Assessment type	Site Inspection				
Parts of the permit assessed	Management, infrastructure & paperwork				
Lead officer's name	Dearle, Nessa				
Accompanied by					
Recipient's name/position	Kevin Trace, Michael Stephens/ Site manager, TCM	Date issued	09/05/2018		

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
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
F3 - Amenity - Dust/fibres/particulates and litter	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

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 Nessa Dearle completed a site inspection on the 3rd of May 2018, to assess compliance with your waste permit. I was shown around site by the site managers Kevin Trace and Michael Stephens.

No breaches were recorded at the time of the inspection, however advice and guidance is outlined below.

Notes

Condition 1.1 of your permit outlines that "the operator shall manage and operate the activities: in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints". As such it is important that your environmental management system remains up to date and reflective of site activities.

Upon inspection of your environmental management system (EMS) it was noted that a review was required. No details have been updated since recent changes in management. For this reason, NRW requests that you review and update your environmental management system, to reflect any changes that have been made to the site.

Your current environmental management system requires regular monitoring of the drainage system. In line with your EMS, you are required to operate a maintenance programme, including emptying of silt traps and interceptors when they have reached capacity. It was noted on site that silt traps contained large amounts or silt. Please ensure that the dewatering system, silt traps and interceptors are regularly maintained, to prevent a build-up of silt. You should also ensure that the records of all maintenance work on site are kept for inspection.

Your EMS also outlines that quarterly sampling of the site discharge point will be completed; including testing of pH, electrical conductivity, temperature, total hydrocarbons and suspended solids. We have not received any recent sampling results for the site. If sampling has been completed, please submit these results via email. Alternatively, if no sampling has been completed, please ensure that samples are taken

as soon as possible.

On site you raised queries in relation to vehicle washing on site, as the sites intends to start using detergents to wash vehicles. Where detergents are being washed into drainage systems, this drainage must be going to foul drainage. Your interceptor system cannot process detergents and these contaminants can affect the performance of your drainage system. For this reason, you will need to ensure that drainage from any areas where vehicle washing is completed is connected to foul drainage. NRW do not provide water discharge licences for vehicle washing, however, you will need permission from Welsh Water to discharge to their foul drains.

Thank you for supplying details of the sites new technically competent management, our records have now been updated with a WAMITAB certificate for the sites technically competent manager, Michael Stephens. Please ensure that you are familiar with the requirements of your permit and the sites environmental management system.

If you have any queries relating to this form or your permit, please do not hesitate to get in contact.

Nessa Dearle

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Email: nessa.dearle@naturalresourceswales.gov.uk

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0033316**

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Site	Cole Contractors Cardiff	Permit Ref	UB3397TY
Operator/Permit holder	Cole Contractors Cardiff Ltd	Date	03/05/2018

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			

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.