

Compliance Assessment Report

Report ID:
CAR_NRW0033846

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

Site	Cott Wrexham (Calypso) Manufacturing Site	Permit Ref	AB3094FQ			
Operator/Permit holder	Refresco Drinks UK Limited					
Regime	Installations					
Date of assessment	22/08/2018	Time in	10:00	Out	12:30	
Assessment type	Audit					
Parts of the permit assessed	1.1.1, 1.4.1, 3.3.3					
Lead officer's name	McClymont, James					
Accompanied by						
Recipient's name/position	Gareth Jones/ HSE Manager	Date issued	28/08/2018			

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
B3 - Infrastructure - Site drainage engineering (clean and foul)	X	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	X	
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 CAR form relates to a site inspection undertaken between 10:00 and 12:30 on the 22nd of August 2018.

Initially an external walkover was undertaken. James McClymont (Regulatory Officer) was accompanied by Paul Sellars (Wrexham Site Leader) and Gareth Jones (HSE Manager).

The probes installed in the surface water drainage system were inspected. These have been lowered, as requested by NRW in CAR_NRW0032616. The probes were being tested at the time of the inspection, with solutions used to alter the pH and electrical conductivity, to test the alarm system. This is done every 3 months, with external calibration undertaken by Denco every 6 months as per the internal procedure.

All drains on site have been marked, blue for surface water and red for effluent drains. Arrows have been marked to indicate the direction of flow within each drain. Clay drain mats have been placed in strategic positions around the yard. Training regarding their use has been provided to staff via monthly briefings.

Waste bins have been labelled according to their contents. This is one of the measures brought into effect by Biffa, who have been contracted to manage the waste generated at the site. The site is looking for their waste to 'pay for itself' and have recently started to generate an income.

The external areas of site were noticeably tidier than during our previous inspection (on the 5th of December 2017). The surface water pooling in a low point in the yard next to the external dry packaging storage area, noted in December 2017, has been rectified.

All external storage appeared to be appropriately bunded. A new orange juice tank is to be placed in the existing external bunded area. There are plans to look at the feasibility of enclosing the whole bunded area to allow temperature regulation.

The new waste compactor was inspected. A cage was being added to improve health and safety practices. This area was noticeably clean and tidy.

Access has been improved to the effluent sampling point. It was noted that there is an underground tank prior to the effluent discharge point. This tank is labelled as an 'interceptor' on the site drainage survey dated 21/07/17.

Action 1: Operator to confirm with NRW the following, by 30/09/2018:

- The purpose of the tank;
- The specification of the tank;
- The maintenance/inspection regime for the tank.

Following the external inspection, an office meeting was undertaken. Paul Sellars introduced the telemetry system for the surface water probes. A TV display is used to monitor trends in surface

water pH, electrical conductivity and flow. There is also telemetry on the borehole abstraction, and soon to be on the effluent flow.

The Environmental Action Tracker was reviewed. Many of the actions on the tracker have been completed. Monthly briefs are used to update staff regarding updated / new procedures. Recent examples include a brief regarding the use of clay mats on surface water drains, and a brief given by Biffa regarding waste recycling and its benefits.

Permit variation EPR/AB3094FQ/V002 was discussed, including updates to the Sewer 1 Form. It was discussed, but not confirmed, during the inspection that the effluent testing undertaken by Refresco is in accordance with the requirements of Permit table S3.3.

Action 2: Operator to confirm with NRW that the effluent testing methodology is in accordance with the requirements of Permit table S3.3, by 30/09/2018.

Following the meeting a brief inspection of the facility interior was undertaken. No Permit breaches were noted.

EPR Compliance Assessment Report

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Operator/Permit holder	Refresco Drinks UK Limited	Date	22/08/2018

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.

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			
G1	X	See comments section	30/09/2018
B3	X	See comments section	30/09/2018

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.