

Compliance Assessment Report

Report ID:
CAR_NRW0031796

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

Site	SPTS Technologies EPR/HP3131KU	Permit Ref	HP3131KU		
Operator/Permit holder	SPTS Technologies Limited				
Regime	Installations				
Date of assessment	20/06/2017	Time in	10:30	Out	14:30
Assessment type	Site Inspection				
Parts of the permit assessed	1.5 Minor operational changes; 2.3.2 Training; 2.6 Waste disposal				
Lead officer's name	Green, Rebecca				
Accompanied by					
Recipient's name/position	Sue Fox/ Environmental, Health & Safety Manager	Date issued	26/06/2017		

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	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	X	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E4 - Emissions - Sewer	A	
E5 - Emissions - Waste	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

The purpose of this meeting was primarily to discuss the new development process, any wastes it might generate and to discuss the increase in hazardous waste generated by the site in 2016.

Present

Sue Fox, Health, Safety & Environment Manager, SPTS;
Chris Webb, EHS Co-ordinator, SPTS;
Toby Jeffery, Project Manager, SPTS;
Jon Peploe, Facilities Supervisor, SPTS;
Rebecca Green, PPC Compliance Officer, Natural Resources Wales.

Agenda

- 1). Business update;
- 2). New development process
 - a). Operating instructions and training;
 - b). Waste treatment;
 - c). Pollution prevention;
- 3). Waste generation, storage and disposal;
- 4). AOB;
- 5). Site inspection, Ringland Way, concentrating on the new process and waste;
- 6). Site inspection, Stephenson Street storage facility.

1). Business Update

Business continues to be strong and new products are in development.

2). New development process

This was discussed in some detail, both in terms of its possible environmental impacts and its technicalities. As it is still in development there are no formal operating instructions. Any training is given informally by the project manager. This is sufficient at this stage of development but more formal documentation will be required once the process is scaled up.

There is no waste treatment on site. All waste is collected and consigned as hazardous waste to be disposed of by a permitted contractor. SPTS should contact Welsh Water (WW) to seek approval for discharge of some of the waste to foul sewer as SPTS already have a Consent to Discharge from WW.

Fugitive emissions from the process are most unlikely as all reasonable measures have been taken to capture any emissions. Further controls may be necessary if the process is scaled up.

NRW should have been formally informed that SPTS were introducing a new process (Permit Condition 1.5 Minor Operational Changes) and are requested to do so now.

3). Waste generation, storage and disposal

SPTS will generate more than two tonnes of hazardous waste during 2017 as the refurbishment plan continues, which means that they will need to complete the PTRT next year. This situation is unlikely to

continue into 2018. The amount of hazardous waste generated still falls below 3,650kg, the threshold for a Low Impact Installation.

4). AOB

No matters were raised.

5). Site Inspection, Ringland Way

The existing GRC columns are being replaced by new units which can treat the waste gases from up to three production units. However, the treatment process is a little more complicated than in the old GRC units. In order to maintain their Low Impact Installation status, SPTS should supply NRW with data confirming that the emissions from the production units would be insignificant even if they were not treated.

During the external site inspection an obvious and significant water leak from the pump on Cooling Tower 3 was noted. There was a lot of standing water which smelt unpleasant, inferring that this leak had been going on for a long time. Usually the system operates with two units, the third being for back-up, but due to the long hot spell all three units were in use and so it had not been possible to repair the faulty pump. SPTS said that they would effect the repair as soon as the weather allowed them to operate with just two units. They should also investigate the reason for the poor drainage in that area and remediate it as soon as possible.

Hazardous waste and some chemical stocks are held outside in secure segregated compartments which are labelled with their contents and hazard. Some labelling was incorrect because it named the actual material, which had changed, but the hazard classification had remained the same. It may be more convenient to label each compartment with the hazard according to CLP, avoiding the need to check and change labels if a material's name changed. The segregation and security of each compartment was commendable.

Storage of general waste was neat and tidy; labelling was generally satisfactory.

Waste arising from the refurbishment was untidy and stored in a heap and the "General Waste" red wheelie bins contained some material that was not general waste. SPTS need to improve organisation of this part of the waste storage, even though it is only a short-term operation.

6). Site Inspection, Stephenson Street

This is just a warehousing operation. Storage was neat and tidy and the building sits within a secure compound. It does not require a permit or any exemptions.

Actions

- i). Repair pump on cooling tower 3 by 30th June 2017 and send photographic evidence that it is no longer leaking. Advise NRW if this is not feasible due to continuing hot weather.
- ii). Investigate reason for standing water near cooling towers. Advise NRW of findings and proposed corrective actions.
- iii). Improve storage and labelling of waste arising from refurbishment project.
- iv). Ensure only "General Waste" is placed in bins labelled as such. Improve training if necessary.
- v). Send a letter or email to formally inform NRW that SPTS are using a new process.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	SPTS Technologies Limited	Date	20/06/2017

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			
B5	X	Repair/replace leaking pump as soon as reasonably practical.	30/06/2017

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.