

Compliance Assessment Report

Report ID:
CAR_NRW0034107

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	18/10/2018	Time in	10:30	Out	11:15	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Bowder, Alex					
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	
	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
	A	
B4 - Infrastructure - Containment of stored materials	A	
	A	
C1 - General Management - Staff competency/training	A	
	A	
C2 - General Management - Management system and operating procedures	A	
	A	
C3 - General Management - Materials acceptance	A	
	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
	A	
D1 - Incident Management - Site security	A	
	A	
F1 - Amenity - Odour	A	
	A	
F2 - Amenity - Noise	A	
	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
	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

Officers Alex BOWDER and David WARWICK-BROWN attended SBS Salvage Ltd, CF63 2QN at 11:00 on Thursday 19th October 2018 to carry out a routine inspection of permit **EPR-PB3530RJ**. Met with business Director Mr. Kayed Ahmed who accompanied Officers around the yard and explained the business processes. Weather conditions were mild and dry at the time of visit.

PREVIOUS CAR FORM ACTIONS

- Amend the business Fire Plan to reflect the Fire Prevention and Mitigation Plan (FPMP) guidance document and submit for assessment by NRW – **Complete**
- Move stored tyres away from flammable material/ignition sources - **Complete**

GENERAL OBSERVATIONS

No breaches were recorded on this inspection. The business has recently taken on the consultant Environmental Focus to assist with the management of the site.

There were less vehicles on site than the last inspection and housekeeping in general seemed under control. It was mentioned that the site now uses suction tanks in the depollution area to extract hazardous liquids from vehicles, rather puncturing and leaving to drain via gravity. These tanks are stored safely and collected by contractors on request. Batteries were stored in appropriate containers.

Scaffolding has been erected near the depollution bay to act as a temporary sheltered area, said to be used for stripping vehicles for parts.

INFRASTRUCTURE AND DRAINAGE

There was use of the spill kit absorbent material for residual oil from the engines, which was good to see. We spoke about making every effort to ensure residual liquid doesn't wash into the drains at times of heavy rainfall, as interceptors are intended to be a last resort. It was said that surfaces have been repaired near the depollution bay to retain the impermeable status.

No issues apparent with the drainage system at the time of inspection - site reminded to ensure drain entries are clear and accessible. Spoke about interceptor maintenance and how often it is checked; it was detailed that this was done biannually.



Picture 1 – showing depolluted engines stored on impermeable surface

TECHNICALLY COMPETENT MANAGER (TCM)

Section 1.1.4 of the permit states that the operator must comply with the requirements of an approved competence scheme. At the time of inspection, it was asked who was the acting TCM for the site - as Kayed's WAMITAB qualification has expired.

It has been declared that Mr. Gareth Danter-Hill of Environmental Focus has been appointed as the TCM for the site; WAMITAB awarded in February 2018. Thank you for sending the certificates through.

Action: Please could the site send through the most current version of the EMS document.

FIRE PREVENTION AND MITIGATION PLAN (FPMP)

The business submitted its FPMP drafted by Environmental Focus on 16 July 2018 for assessment by NRW. The document is a tailored comprehensive plan which addresses the various factors.

It includes a site plan detailing building and storage areas and drainage system along with common causes of fire and preventative measures. It also outlines the potential combustion factors and issues associated with fire water run-off. Storage times and tonnage limits for materials have also been stated.

Please ensure that this plan is adhered to, implemented on site and updated accordingly with operation changes.

WASTE RETURN DOCUMENTS

These are required annually by the permit and will be due to be submitted in January 2019. Please endeavour to submit within the grace period.

If you have any issues with this report please contact Alex Bowder on 0300 065 3394 or

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

In addressing the points raised above it should not be relied upon to mean that the measures are considered to represent appropriate measures covering every eventuality through operation of the permit. **Your FPMP should be kept under constant review to ensure measures remain effective. You must also ensure that the plan is fully implemented on site at all times. The plan should be revised where necessary in accordance with Section 24 - Reviewing and Monitoring your Fire Prevention & Mitigation Plan of the guidance.**

In a future compliance assessment visit, we will undertake an assessment of your compliance with your FPMP.

EPR Compliance Assessment Report

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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.