

Compliance Assessment Report

Report ID:
CAR_NRW0034346

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

Site	RDA Recycling Ltd	Permit Ref	NP3895FH			
Operator/Permit holder	Kayleigh Parsons					
Regime	Waste Operations					
Date of assessment	12/12/2018	Time in	10:30	Out	11:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Bowder, Alex					
Accompanied by	Warwick-Brown, David					
Recipient's name/position	Kayleigh Parsons/ Director	Date issued	19/12/2018			

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)	C3	Table 3.1 [g] i)
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	Table 5.1 [d] (i)
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	C4	6.2.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	3	Total compliance score (see section 5 for scoring scheme)	8.1
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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

Officers Alex BOWDER and David WARWICK-BROWN attended RDA Recycling Ltd at 10:30 on Wednesday 12th December 2018 to carry out a routine inspection of permit **EPR- NP3895FH**. The weather conditions were cold and dry at the time of visit. Met with business director Kayleigh Parsons and walked around the yard.

PREVIOUS CAR FORM ACTIONS

- Reduce the stacking height of ELVs – **Complete**
- Do not stack vehicle shells more than three high in the yard in future – **Complete**
- Submit outstanding Waste Return spreadsheets – **INCOMPLETE**
- Do not store parts on top of drain openings - **INCOMPLETE**

CATEGORY 3 BREACH

B3 – INFRASTRUCTURE – SITE DRAINAGE ENGINEERING (CLEAN AND FOUL)

Table 3.1 - Site containment & drainage standards

[g] i) *"inspection and maintenance of engineered containment shall be inspected no less frequently than monthly, to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance shall be recorded in the site diary;"*

The drainage vents and in the yard seemed clogged at the time of inspection. This indicates that the drainage system or the interceptor has not been maintained properly in accordance with the permit. When asked about when the system was last inspected, it was stated that it had not been looked at in weeks.

A vehicle part was also stored on top of a drain opening, as per photograph 1. Better housekeeping should be executed to ensure the drainage system is fully accessible and functioning efficiently.

ACTION:

- Set in place weekly maintenance checks for the drainage channels and system.
- Remove all parts stored covering drain entries. Do not store in this manner in future.



Picture 1 – showing vehicle part stored on top of drain opening in the yard

CATEGORY 3 BREACH C4 - GENERAL MANAGEMENT – STORAGE, HANDLING LABELLING AND SEGREGATION Table 5.1 [d] control and remediation of leaks and spillages: i) <i>“minor spillages of oil, fuel or other end of life vehicle fluid shall be cleaned up immediately, using sand or proprietary absorbent to clean up liquids and in alternative containers.”</i>	At the time of inspection there were several patches of residual oil and diesel seen on the yard surface. Any leaking substance or spillage should be identified and seen to immediately with spill kit absorbent material. This is to prevent any potentially polluting substances from entering the drainage system in the first instance. ACTION: - Use spill kits for residual oil patches on the yard surface. - Educate staff as to when spill kits should be used. We will be checking use of spill kits on next inspection. Major spillages should be recorded in your site diary.
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Picture 2 – showing residual oil from removed engines on the yard floor

CATEGORY 4 BREACH
G2 – RECORDS OF ACTIVITY,
SITE DIARY /JOURNAL/EVENTS

Condition 6.2.1

“A site diary shall be kept secure and shall be available for inspection at the site when required by an authorised officer of the Agency. This shall include a record of the following events, in accordance with the other conditions of this licence....[]”

Condition 6.2.1 of your permit requires a site diary to be kept and maintained. It was evident that the site diary only had one entry, which consisted of a fire back in 2017 with no further detail.

The site should be conducting strict site diary entries for all maintenance, spillages, and TCM attendance in accordance with **Section 6.2.1** of your permit:

- a) construction work;
- b) maintenance;
- c) breakdowns;
- d) emergencies;
- e) problems with waste received and action taken;
- f) technically competent management attendance on site: the date and the time onto site and the time left site;
- g) complaints about site operations and actions taken;
- h) environmental problems and remedial actions.

Each record shall be completed within 24 hours of the relevant event.

ACTION:

Please start inputting diary entries and recording site activities in line with your permit condition with immediate effect.

GENERAL OBSERVATIONS

Tyres were stored at various locations across the yard; some behind the depollution bay, some in the middle of the yard and some by the office unit. It was mentioned that the tyres in the middle of the yard were stored temporarily, ready for transfer off site to a contractor. Better tyre storage should be implemented across site.

Metal shelving has been installed in the unit at the front of the yard for parts, makes for good housekeeping. There were less than 100 cars stored in the yard – all removed vehicle batteries were stored within containers.

The baler machine is now active, which assists with crushing ELV shells before transferring to contractors for recycling/recovery. It was mentioned that the office unit will be moving in early 2019.

If you have any issues with this report, please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

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

EPR Compliance Assessment Report

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Operator/Permit holder	Kayleigh Parsons	Date	12/12/2018

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			
G4	X	Submit Waste Return Spreadsheets as detailed in the report.	19/01/2019
G2	C4	Please start inputting diary entries and recording site activities in line with your permit condition with immediate effect.	19/01/2019
C4	C3	- Use spill kits for residual oil patches on the yard surface. - Educate staff as to when spill kits should be used.	19/01/2019
B3	C3	- Set in place weekly maintenance checks for the drainage channels and system. - Remove all parts stored covering drain entries. Do not store in this manner in future.	19/01/2019

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.