

Compliance Assessment Report

Report ID:
CAR_NRW0026959

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

Site	Western Power Distribution Bridgend	Permit Ref	AB3392ZY			
Operator/Permit holder	Western Power Distribution (South Wales) PLC					
Regime	Waste Operations					
Date of assessment	24/01/2017	Time in	12:15	Out	13:15	
Assessment type	Audit					
Parts of the permit assessed	Permitted area					
Lead officer's name	Davies, Gareth					
Accompanied by						
Recipient's name/position	Jill Russell/ Environment Manager	Date issued	26/01/2017			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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 - Infrastructure - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - Infrastructure - Management system and operating procedures	A	
D1 - Infrastructure - Site security	A	
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	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

Present

Gareth Davies (GD) – Natural Resources Wales (NRW).

Jill Russell (JR)– Western Power Distribution (WPD)– Environment Manager.

Maurice Eshelby (ME)– Western Power Distribution – Distribution Manager.

Ian Evans (IE)– Western Power Distribution – Team Manager.

Gary Davies (GE)– Western Power Distribution – Projects Team Manager.

Steve Rudd (SR) – Western Power Distribution – Team Manager.

The purpose of the inspection was to assess compliance with the environmental permit that was issued to Western Power Distribution (South Wales) PLC, permit number EPR/AB3392ZY. This was the first inspection following the permit being issued on 6 January 2017.

JR gave an introduction as the reason for applying for the environmental permit and the operations carried out by WPD. Used insulation oils are brought back to the site either by WPD or their contractors for storage prior to removal off site. The insulation oils arrive on site under a consignment note. The oil is then sent to one of two sites who hold the relevant permits to accept the waste. No treatment of oils is carried out on site.

To aid discussion GD ran through NRW's first inspection check list. JR confirmed that WPD have a company wide ISO accreditation and site based environment management system. This was viewed on site and will continue to be completed throughout the life of the site.

There is no specific reference in the standard rules 2012 No15 to NRW's How to Comply Guidance, but JR was aware of the content of the document. WPD have sufficient WAMITAB cover in place and IE is due to obtain the relevant qualification. The How to Comply Guidance document will provide information on the amount of time that the relevant WAMITAB qualified person is required to be on site. JR was aware of the waste returns and consignee returns process from the other sites operated by WPD. Further information can be found via the links below:

Waste Returns - <http://naturalresources.wales/waste/new-wales-operator-waste-return-and-deadlines-for-returns/?lang=en>

Consignee Returns - <http://naturalresources.wales/waste/hazardous-waste-returns/?lang=en>

A discussion about the variation of the permit was had in order to add an additional waste code. Standard rules permits cannot be varied to add an additional waste code. JR agreed to confirm what approach and waste code is being used to classify the transformers brought back to the site for storage.

This is being done at other similar sites and JR would provide the relevant information to GD.

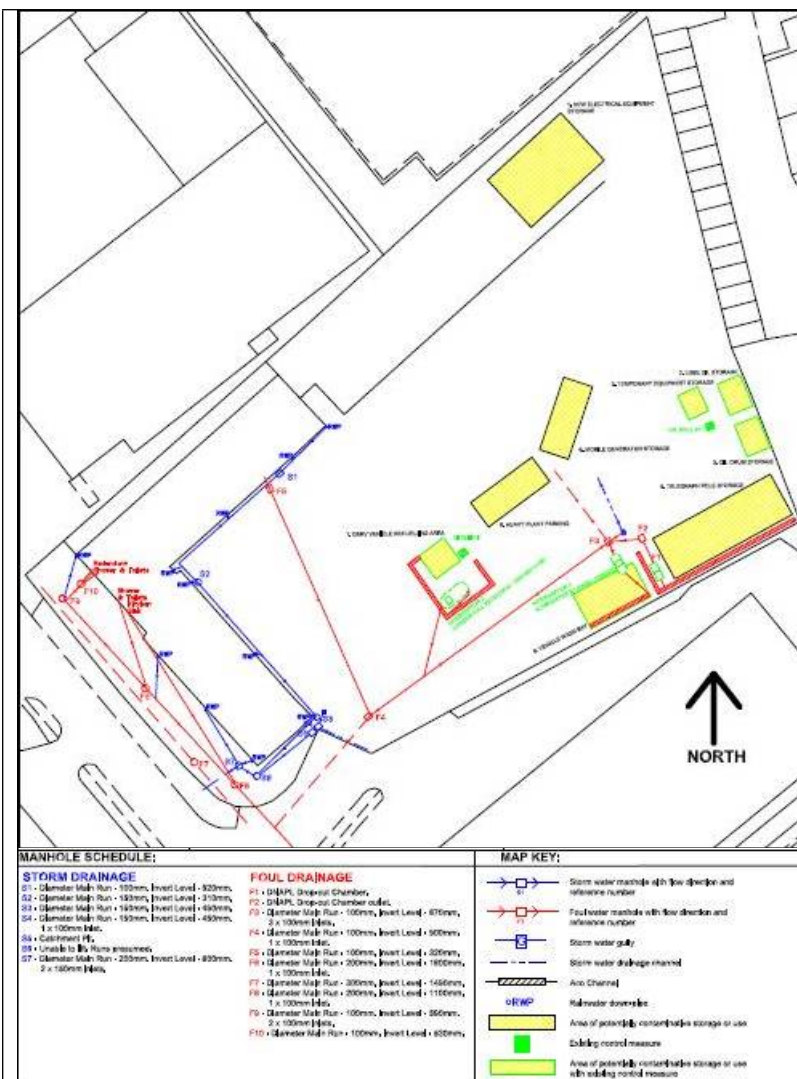
The used insulating oil is stored in a storage container which has a self-contained bund. The insulating oils are stored here until a sufficient quantity has been accumulated and then these are removed off site. A picture of the container can be seen below.



Spill kit was available on site and all staff who handle the oil containers have received relevant spill training. Spill kits are also stored on all WPD vehicles that transport and deal with insulation oil on site.

WPD also have a contract with an emergency spill response contractor in the event of a spill that requires managing.

A discussion was held around the drainage on site in the event of one of the oil containers being punctured. A copy of the drainage plan can be seen below. All of the drainage on site goes to the foul sewer as required under the permit. Within the internal drainage any spill from the container area would first pass through the interceptor that services the creosote pole storage area. Due to this being an inverted interceptor the oil would pass through this interceptor and on to the next section of the drainage system. If a spill were to happen then it may have an impact on the interceptor that serves the creosote pole storage areas. It is also recommended that detergents are not used in the vehicle wash down bay that is served by an interceptor. The use of detergents will reduce the performance of the interceptor. A number of Pollution Prevention Guidelines have been provided below. Although these are from SEPA's website, the information contained within them remains relevant.



IF WPD wished to relocate the container storage area, then this would require an administrative variation to be submitted to NRW. There is no fee for this and just the relevant application forms and amended plan would need to be submitted. Information on applying for a variation via the link below.

<http://naturalresources.wales/apply-for-a-permit/waste/waste-permitting/apply-to-vary-change-a-permit-for-waste-operations/?lang=en>

Pollution Prevention Guidelines

Vehicle Washing

<http://www.sepa.org.uk/media/60164/ppg-13-vehicle-washing-and-cleaning.pdf>

Use and design of oil interceptors

<http://www.sepa.org.uk/media/60086/ppg-3-use-and-design-of-oil-separators-in-surface-water-drainage-systems.pdf>

Safe Storage and Disposal of used oils

<http://www.sepa.org.uk/media/60151/ppg-8-safe-storage-and-disposal-of-used-oils.pdf>

There were no breaches of the permit identified during the visit. Any compliance criteria not highlighted in the above summary shall be considered as not assessed. END

EPR Compliance Assessment Report

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Site	Western Power Distribution Bridgend	Permit Ref	AB3392ZY
Operator/Permit holder	Western Power Distribution (South Wales) PLC	Date	24/01/2017

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.

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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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.