

Compliance Assessment Report

Report ID:
CAR_NRW0023793

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

Site	Arch Motors	Permit Ref	RP3394FS			
Operator/Permit holder	Thomas Arthur Roberts					
Regime	Waste Operations					
Date of assessment	09/06/2016	Time in	10:00	Out	11:30	
Assessment type	Site Inspection					
Parts of the permit assessed	EMS and Site Infrastructure					
Lead officer's name	Zachary, Aled					
Accompanied by	Briscoe, Ross					
Recipient's name/position	Mr Arthur Roberts/ Owner	Date issued	09/09/2016			

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
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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

Site visit to discuss compliance with the enforcement notice served on the 19/02/16 and implementation of an Environmental Management System.

Compliance with Enforcement Notice.

The conditions of the enforcement notice is deemed to have been complied with following a visit to site on the 01/06/16, this was formally confirmed in writing to you on the 03/06/16. The following permit conditions were assessed to have now been complied with:

- 1.1.1 - Implement a written environmental management system (EMS), further commentary on this below.
- 2.4.1 - The improvement works to the drainage channels on the side(s) of the Undepolluted ELV storage area has now been completed.

Compliance with this condition also includes ensuring all undepolluted vehicles are only stored on areas of impermeable pavement with sealed drainage and that vehicles are treated to the standards specified in Article 6(1) of the end of Life vehicle directive.
- 2.5.1 - Implement an emissions management plan (EMP). This has been completed as part of the EMS implementation. Treated End-of-Life Vehicles are now only crushed on a metal plate on a concreted area of the site with sealed drainage. A written procedure covering this operation is now available.
- 3.1.1 - This has been covered as part of the EMP implementation discussed above.

Environment Management System (EMS) Review.

As discussed above, the current version of the site EMS (First Issue: 2016) is deemed sufficient to meet the requirements of Permit Condition 1.1.1. However, the EMS should continue to be improved / amended to ensure it reflects the site operations if / when they change.

It is recommended that you consider adding or amending the following information and procedures to the EMS:

1. The Site plan / drawing should include details of where the site interceptor drains to.
2. Table 2A refers to the procedure for detonation of airbags. It is recommended that car windows are down when this is carried out to reduce the risk of breaking glass.
3. The depollution process should also list the detonation of seatbelt pre-tensioners as a requirement, as per the regulations. Other resources such as the Autodrain website and the International Dismantling Information System (IDIS) www.idis2.com should be referenced.
4. The de-cattig procedure refers to the use of propane cutting torch. It is advised that this should be reviewed due to the risks

associated with the use of hot flame cutting equipment in close proximity to the fuel tank and potential sources of fuel vapours.

5. As section detailing who holds the Certificate of Technical Competence (COTC) and how often this requires renewal should be added to the EMS.
6. A section detailing the permitted waste types and quantities should be added including waste acceptance checks and how these are monitored. It should also detail how long wastes are typically stored on site and the procedures for their removal (Details of Waste Oil removal etc)
7. Details of site security measures and site notice board should be added.
8. Procedures to cover the following potential sources of emissions should also be added:
 - Control of litter
 - General Spill procedure and location of spill equipment
 - Minimisation of noise and response to noise complaints
 - Procedure in the event of a fire (Who to notify, Location of Fire Extinguishers etc)
 - Contingencies in the event of plant failure
9. The EMS contents section should be numbered for ease of reference and link to the specific sections.
10. A section should be added detailing the current plan for site closure and permit surrender if / when the business ceases to trade in future.

Non-Compliances.

No permit breaches were observed during the visit.

Advice and Guidance.

A letter detailing NRW's position regarding when a premises is required to notify that it produces hazardous waste and our position on the reclassification of catalytic converters is attached to this CAR(1) form for your attention.

EPR Compliance Assessment Report

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Operator/Permit holder	Thomas Arthur Roberts	Date	09/06/2016

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			

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.