

Compliance Assessment Report CAR_NRW0038463

Permit being assessed: BU7766IC.

For: Bryn Posteg Landfill , held by Sundorne Products (Llanidloes) Ltd

At: Bryn Posteg Landfill Site Tylwch Road , Llanidloes, Powys, SY18 6JJ.

Type of assessment carried out: Audit, Reason: Routine.

On 16/06/2021 between 10:30 and 16:50.

Parts of permit assessed: See report

NRW Lead Officer: Lara Cubley, accompanied by Jamie Blythin.

Report sent to: David Williams / Deborah Hall, Technical Manager / EH&S Compliance Manager on 11/02/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
C2 - General Management - Management system and operating procedures	C3 Minor	1.1 and 4.2
B5 - Infrastructure - Plant and equipment	C3 Minor	1.1.1
E3 - Emissions - Surface water	C3 Minor	3.1.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3 Minor	2.3.1 & 1.1
E2 - Emissions - Land and groundwater	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
4	16

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C2	<p>ACTION 1: Please provide evidence in support of achieving water consumption and chemical usage target.</p> <p>ACTION 2: The Operator should review this process and provide NRW with a clear plan on how he/she will be addressing auditing/monitoring in writing.</p> <p>ACTION 3: The Operator must comply with their Document Control Procedures with immediate effect.</p> <p>ACTION 6: The Operator should provide a procedure for Management Review to NRW in writing and ensure it is</p>	31/08/2021

Criteria	Action needed	Complete by
	implemented with immediate effect.	
C2	<p>ACTION 4 : The Operator should inform NRW in writing how they propose to ensure the Non-Conformance, Corrective and Preventative Action Procedure is implemented and in particular the Reporting requirement in accordance with the Permit Condition 4.3.</p> <p>ACTION 5: The Operator must complete the investigation into root cause of the incident and provide updated non-conformance report/Part A/B in writing. Further information should also be provided regarding the extent of the effluent leak and clean up conducted or to be instigated.</p>	31/08/2021
B5	ACTION 7: The Operator should provide a plan in writing to NRW with timescales regarding how he proposes to come into compliance with the EMS requirements of a Planned Preventative Maintenance (PPM) system.	31/08/2021
E3	Stop emission with immediate effect.	Already completed
B3	<p>ACTION 8: The Operator must clean and CCTV survey the entire length of the treated leachate effluent sewer submitting a copy of the CCTV survey & report confirming the sewer integrity to NRW. This work shall be undertaken by those suitably qualified and the report should include evidence to demonstrate this.</p> <p>ACTION 9: Provide NRW with all specialist contractor survey and cleaning reports conducted to date as a result of the incident by 30/07/21.</p> <p>ACTION 10: The Operator must provide NRW a written review of the incident findings identifying the root cause together with actions and suggested improvements with timescales for completion in order to prevent recurrence.</p> <p>Actions should include but not be limited to:</p> <p>Reviewing key elements of the EMS, i.e. Aspects Register (risk assessment), and associated management plans (i.e. accident and the Leachate Sewer Management and Monitoring Plan) to be submitted to NRW following revision.</p> <p>Development of inspection plans & records to be submitted to NRW.</p> <p>See Action 12 due to CAR form update.</p>	01/07/2022
E2	ACTION 11: The Operator should investigate this contamination and report findings back to NRW in writing.	31/08/2021

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

Natural Resource Wales (NRW) visited Bryn Posteg Landfill on the 16th June 2021 to follow up on progress with Environmental Management System (EMS) improvements/implementation further to the audit of 12th February 2020 and investigate the sewer incident (WIRS reference no. 2104669). A site general site walkover was also undertaken.

Environmental Management System (EMS)

NRW re-visited the progress made with EMS development and implementation following the audit of the 12th February 2020 (CAR_NRW0036490).

The Operator has produced and provided a number of key EMS documents as part of the development of their EMS since the 12th February 2020 audit so as to comply with Permit Condition 1.1 and the NRW Guidance 'How to Comply with your Permit'. Document Control Procedure, Roles & Responsibilities, Site Responsibilities, Environmental Audit Plan and Procedures.

Objectives & Targets

NRW revisited the Objectives & Targets for 2020. A couple of targets were noted as, 'not achieved due to Covid'. These related to training and biodiversity. Those noted as, 'achieved' were:

- minimising releases of air contaminants (25% reduction in Carbon Dioxide/Methane in perimeter boreholes and reduction in leachate heads to 1m compliance limit); and
- minimise raw material use (reduce water consumption by 15% and chemical usage by 10%).

However, when looking at the available evidence it appeared that the methane target had been achieved but not the Carbon Dioxide target. The Operator couldn't provide evidence in support of achieving the water consumption and chemical usage target. The reason given was that the water bill used to calculate achievement of the target is at head office and currently not available.

ACTION 1: Please provide evidence in support of achieving water consumption and chemical usage target by 31/08/21.

A document dated 03/05/2021 showing 6 targets for 2021 was provided. This lacked definition and planning. **ADVICE & GUIDANCE: The Operator should provide definition and planning for achieving these objectives otherwise they risk not being achieved. This should include apportioning of responsibilities, monitoring and tracking to achievement.**

Audit Plan/Procedures

NRW reviewed adherence against the 'Bryn Posteg Site Audit Plan 2020 – 2021'. The following

audits were planned:

- Leachate Management Plan July 2020
- Odour Management Plan September 2020
- Gas Management Plan November 2020
- Surface Water Management Plan January 2021
- Non-Conformance Reports March 2021
- Incident Reports May 2021

None of these audits have been conducted as per the plan, although some audit work on the gas system had been undertaken by the new Site Manager. The reason for this was stated as Covid-19.

NRW viewed a document 08/06/21 detailing a recent EMS audit conducted at the site by the Operations Director. This did not appear to be on the audit plan and seemed to follow a set template/format. There were several findings/actions that, according to the template and scoring system, meant a follow up audit was required within 28 days.

There appears to be a muddled system of auditing/monitoring to check that EMS procedures are implemented, and the management system is being adhered to. **ACTION 2: The Operator should review this process and provide NRW with a clear plan on how he/she will be addressing auditing/monitoring in writing by 31/08/21.**

Non-Conformance, Corrective & Preventative Action

The Operator provided Non-Conformance, Corrective and Preventative Action Procedure dated 01/06/2020 V2 by e-mail on 08/06/2020 in response to actions from the February 2020 EMS audit. During the inspection the Operator provided this procedure with the same name date and version number but the procedure had been changed. It was shorter and no longer contained elements regarding identification of root cause, records and communications. As there appeared to be no control over this document it was difficult to understand why and how this came to be revised.

ACTION 3: The Operator must comply with their Document Control Procedures with immediate effect.

A record of site members having been trained in this procedure on the 11/06/2021 was available. The Operator also showed us a toolbox talk on Near Miss & Hazard Reporting from September 2020. A reporting system involving a pad of Near Miss forms was also observed.

A spreadsheet used for tracking incidents split into a system of red/amber/green was also observed and the two non-conformances reviewed below were included on this tracking.

Within a paper copy site file we reviewed two Non-Conformance Forms kept in a file as follows:

- a. Effluent leak through replacement metal fitting on DAF machine 06/05/21; and,
- b. Treated effluent leak from sewage discharge pipe (through manhole) 02/06/21.

Incident investigation into non-conformance b related to the discharge of treated effluent from the site sewer manhole to the watercourse is still ongoing and detailed under Sewer Incident (WIRS reference no. 2104669) heading below.

In terms of the Non-Conformance Forms it is difficult to tell what actions are to be completed versus have been completed and whether the 'action to be completed by' 'date' relates to the date the actions should be completed by or are actually completed by. **ADVICE & GUIDANCE:** Form could be updated to be clearer.

In reviewing the incident a), the form contained no detail regarding environmental impact and clean

up of the effluent leak. The Non-Conformance, Corrective and Preventative Action Procedure refers to reporting environmental incidents to the regulator in line with permit conditions. NRW were also not notified of this incident as required by Permit Condition 4.3, and the Non-Conformance, Corrective and Preventative Action Procedure.

From the detail on the form and discussion with the Operator it would appear that the root cause of the incident was not properly investigated/detailed. As such corrective/preventative actions may require further commitments. Areas warranting further investigation are:

- Methods of sourcing replacement fittings to correct specification/materials
- Review of design life and planned preventative maintenance of pipework/fittings
- Review of containment in failure scenarios

NRW are of the opinion that the Operator is in breach of Condition 1.1 of the Permit (C2 Management Systems - CCS3) .

ACTION 4 : The Operator should inform NRW in writing how they propose to ensure the Non-Conformance, Corrective and Preventative Action Procedure is implemented and in particular the Reporting requirement in accordance with the Permit Condition 4.3 by 31/08/21.

ACTION 5: The Operator must complete the investigation into root cause of incident a) above and provide updated non-conformance report/Part A/B in writing by 31/08/21. Further information should also be provided regarding the extent of the effluent leak and clean up conducted or to be instigated.

Management Review

The Operator does not conduct a formal documented management review of the EMS. It is understood that there are regular monthly heads of department management meetings which include a company director and involve communication regarding environmental issues. Minutes to such a meeting of 16/03/21 were reviewed. Entire sections under some sub-heading were left blank.

Management review is an integral part of an EMS. You must regularly review your management system to ensure it is appropriate and being implemented at least annually and if there are changes, permit variation, or accident/incident. Results of monitoring, targets, internal audits provide directors with an opportunity to look at how effective the management system is and to consider any actions or changes to improve it. Reviewing the outcomes for one period; you can plan the objectives and targets for the next. Review ensures your EMS is kept up to date and continually improved with commitment from Directors.

ACTION 6: The Operator should provide a procedure for Management Review to NRW in writing by 31/08/21 and ensure it is implemented with immediate effect.

Maintenance

The Operator provided IMS procedure, 'Asset Management (Doc ref. SFS4-06 Issue 1 dated 09/06/21) and electronic Excel file 'Asset Management Register June 2021' (Doc Ref. SFS4-07) via e-mail on the 11/06/21 in preparation for the audit. During the inspection we reviewed IMS Procedure, 'Preventative Maintenance – LNF' (Doc no. EMS3_13.19-LNF v1).

No critical equipment list was available as per the procedure provided and the 'Asset Management Register June 2021' had key pieces of equipment missing. For example but by no means exhaustive, LTP ferric dosing pump, LTP pump from treatment lagoon to clarifier, LTP flow monitor and other LTP monitoring probes, Aerators, Leachate treatment lagoon level monitor/alarm, and

plate heat exchanger.

We reviewed the maintenance related to the Small Waste Incineration Plant (SWIP). The Operator provided a record of a service of the boiler from 20/04/2020 to 21/04/2020 undertaken by a contractor. The Technical Manager stated that the boiler is under contract to be serviced 4 times per year. A quote to that effect was provided dated 09/04/20 but no further service records or evidence in support of a contract being established were made available. We understand that the SWIP is currently undergoing considerable refurbishment and repair.

The service record of April 2020 picked up several issues as follows:

- heat exchanger tubes being blocked
- ID fan housing rusted
- cyclone severely blocked with ash and holes
- interior flue gas recirc pipes rotted
- underneath grate very blocked up with amount of glass, nails and molten metal (5 x 30l bucket of metal removed not including ash), auger snapped, some grate elements bent and under grate clevises worn.

NRW can only conclude from the records available that an effective programme of preventative maintenance of the SWIP has been absent. The issues identified would have impacted the environmental performance of the plant as a result of this inadequate preventative maintenance. The contamination with metal and glass is also indicative of non-conforming chipped wood fuel.

The Operator reported that they are looking to place a new contract for the maintenance of the SWIP.

The Operator reported that they are currently developing a spreadsheet for planning in and recording maintenance activities otherwise they currently use a calendar.

NRW are of the opinion that the Operator has breached Condition 1.1.1 of the Permit (B5 Plant & Equipment CCS3).

ACTION 7: The Operator should provide a plan in writing to NRW with timescales regarding how he proposes to come into compliance with the EMS requirements of a Planned Preventative Maintenance (PPM) system by 31/08/21.

Sewer Incident (WIRS reference no. 2104669)

Further to an incident related to pollution of Nant Bryn Du being reported via the NRW incident line of 28/05/21, subsequent reports were received. NRW notified the Operator and incident response visited site on the 02/06/21 where it was established that treated effluent was surcharging from the sewer manhole and entering the watercourse. The Operator provided a Schedule 5 Part A & B notification to NRW on the 07/06/21.

NRW is of the opinion that the Operator breached Condition 3.1.1 which requires that there shall be no point source emissions except from those listed (E3 Emissions – Water CCS3)

Further investigations and discussions related to the incident were undertaken on site. The Operator provided the Leachate Sewer Management and Monitoring Plan (Sewer MP2005v1) which is listed in the Permit as an Operating Technique (Table S1.2). This plan requires the following monitoring, *'regular inspections of the manhole chambers along the pipeline, at least once*

every two months the inside of the chambers are inspected to ensure that they are structurally sound and that there is no evidence of anything impeding the flow. We also walk the line of the sewer to check for any emissions that may be arising from our Private Sewer. On an annual basis the pipeline will be jetted clean and a Closed Circuit Television (CCTV) survey will be taken through the pipeline and a report produced to confirm the integrity of the system.'

The Operator reported that the last inspection was conducted on the 29/04/21 and the A4 individual Daily Diary sheet kept in lever arch file for that day stated, '*sample pipe inspected*' under '*Miscellaneous issues*'. These Daily Diary sheets were reviewed as far back as September 2020 with no other records which would indicate such inspections or CCTV survey.

Another bound A4 paper diary for 2020 was inspected which had reportedly been populated by the previous site manager. The most recent entry which the Operator thinks may be a record of such inspections states, '*drain check*' on the 04/03/21 page. Looking back at previous dated pages in this bound diary the same '*drain check*' entry is recorded at a minimum frequency of every 2 weeks.

The Operator stated that site personnel conducted a CCTV survey the weekend after being alerted to this incident. However, they report that a section of their sewer (approximately 100m) could not be surveyed with their equipment due to the depth of the sewer. NRW reviewed some of the CCTV camera survey undertaken on the 03/06/21 commencing 11:15. This showed a section which the Operator thought to be a connection or obstruction of the sewer below the surcharging manhole. The Operator have appointed a contractor to jet and survey this section of concern/blockage and they were on site at the time of our visit. Current feedback suggested that this was a seal between two sections of pipe.

No previous annual CCTV survey records could be provided by the Operator, nor could records or reports of the pipeline having been jetted clean confirming the integrity of the system as required by the Leachate Sewer Management and Monitoring Plan.

On inspection of the sewer drawings from the site to Llanidloes it would appear that there are 25 manholes that would require inspection. The Operator indicated that those down in Llanidloes are thought to have been adopted by the sewerage undertaker. Diary entry, '*drain check*' or '*sample pipe inspected*' are not considered an acceptable record of walking the entire length of this considerable length of sewer and inspecting 25 manholes chambers internally. Condition 1.1.2 of the Permit requires records to demonstrate compliance with management systems to be maintained. It is advisable to have an inspection plan and record sheet to include all manholes, with space to record finding regarding condition and flow. Taking photos and recording any other issues related to the inspection should be completed.

NRW is of the opinion that the Operator has breached Condition 2.3.1/1.1 of the Permit (B3 Site Drainage Engineering CCS2). The Operator has failed to maintain the sewer with potential for significant impact on the environment. Please note that the severity of this breach has been downgraded to CCS3 based on further survey information provided below.

ACTION 8: The Operator must clean and CCTV survey the entire length of the treated leachate effluent sewer submitting a copy of the CCTV survey & report confirming the sewer integrity to NRW. This work shall be undertaken by those suitably qualified and the report should include evidence to demonstrate this.

ACTION 9: Provide NRW with all specialist contractor survey and cleaning reports conducted to date as a result of the incident by 30/07/21.

ACTION 10: The Operator must provide NRW a written review of the incident findings identifying the root cause together with actions and suggested improvements with

timescales for completion in order to prevent recurrence.

Actions should include but not be limited to:

- **Reviewing key elements of the EMS, i.e. Aspects Register (risk assessment), and associated management plans (i.e. accident and the Leachate Sewer Management and Monitoring Plan) to be submitted to NRW following revision.**
- **Development of inspection plans & records to be submitted to NRW.**

Sewer Incident/CAR Update

This completed CAR was sent to the Operator on 26/07/21, since then the Operator responded by e-mail dated 09/08/21 and submitted sewer inspection records to NRW on 20/08/21. This section of the CAR provides an update to reflect provision of further evidence.

These additional records provided on 20/08/21 showed that the following CCTV surveys had been conducted on stretches on the sewer between manholes 1 and 20 on/between the following dates:

- 2021 - on 16/06/21 (MH 17 - 20), 11/08/21 - 13/8/21 (MH 1 - 6) and 16/08/21 - 17/08/21 (MH 6 - 17)
- 2019 - between 05/04/19 and 10/04/10
- 2018 - between 11/06/18 and 14/06/18

As requested, the Operator also provided further evidence of the 2020 sewer CCTV records on 04/02/22. This survey was reportedly conducted by the Site Manager and Technician using a contractor's (SGG) camera equipment due to Covid 19. The survey report sheets from each manhole stretch surveyed are on SGG letterhead but the technicians are the Operator's employees. These show the survey to have been conducted between 10/06/20 and 24/06/20, and the meterage, with no issues observed over the length of the survey. The maximum stretch of sewer surveyed using this camera appears to be 56.59 metres, which is comparable to the 57 metres evidenced in the 2018/19 contractor survey. NRW have not reviewed any of the CCTV footage related to this survey.

NRW have conducted a review of the survey data supplied by the operator regarding the camera surveys conducted by both third-party contractors and the operator. Utilising the 2011 plan as a baseline, the private sewer line has been mapped and assessed as being approximately 2 km long (---1980 metres). The 2011 plan displays straight lines between the manholes, it is unknown if this indeed represents the sewer truly as laid and therefore the potential for legs to be longer exists.

The survey camera utilised by both the operator and the contractor is approximately 50 metres in length. 57 metres is evidenced for the contractor's camera cable and 45 – 50 metres was stated as the length for the operator's camera equipment. In addition, certain legs cannot be fully surveyed to the ~50-metre extent due to reported steep inclines. Complete survey coverage when attainable on the shorter legs, is achieved by surveying from manholes both upstream and downstream on a leg. Having reviewed and mapped the reported surveyed lengths for 2018, 2019 & 2021, approximately 620 metres of the sewer line have not been surveyed. Nine sewer line legs exceed the 100 metre and 114 metre possible survey limits.

These restrictions in camera cable length make a complete survey of these legs by either the contractor's or operator's camera systems impossible to achieve. This, in conjunction with the inability to pass steep sections means that only 10 of the 20 sewer legs can be completely

surveyed by the current camera system.

ACTION 12: The Operator should ensure that a full survey of the entire length of the sewer is conducted periodically in order to manage the the risk posed by the unsurveyed sections. A survey of these unsurveyed lengths should be conducted by 01/07/2022. Further to this a 5 yearly full survey is considered acceptable.

Other Inspection Items

The concrete slab housing the two LTP chemical treatment tanks were inspected. This newly constructed concrete slab has been moved eastwards, reportedly due to an underlying area of soft ground in the previous location. Work is almost complete in this area. It was noted and pointed out to the Operator that there appeared to be a small leak from what was thought to be the newly connected draw-off pipework to the tank.

It was also noted and pointed out to the Operator that these two treatment chemical tanks, believed to be integrally bunded, had valved outlets. It is uncertain whether these are from the tank or bund. There were also further such blanked off outlets not leading to a valve. **ADVICE & GUIDANCE:** The Operator is advised to ensure any valved outlets to tank/bund are as a minimum secured by lock but better still blanked off to comply with bunding/storage guidance.

Leakage of pipework at a dripping rate in the LTP area behind the heat exchanger container was pointed out to the Operator. The Operator advised that this was a potable water pipe. **ADVICE & GUIDANCE: Ensure leak is fixed in line with resource efficiency requirements.**

None-the-less the area of pooled liquid and ground in this area behind the heat exchanger container showed signs of contamination from colour observations.

ACTION 11: The Operator should investigate this contamination and report findings back to NRW in writing by 31/08/21.

The stockpiles of off-spec compost on the cap where inspected due to previous concerns and advice regarding the potential for pollution of surface waters. Sampling and analysis has recently shown elevated concentrations of ammonia. The one stockpile has had a shallow trench to direct this run-off to a sump for collection and pumping to the leachate treatment plant. The Operator has agreed to do the same with the other stockpile in order to help manage the potential pollution impact.

NRW reminded the Operator that storage of this off-spec compost in this location is currently not permitted as the pre-operational condition for this waste code has yet to be satisfied.

The leachate level in the void appears to have risen since last inspection.

Signs of what is thought to be leachate from the compost pad settling tank was evident leaking from the embankment given the warm dry conditions during the inspections.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.