

Compliance Assessment Report

Report ID:
CAR_NRW0035077

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

Site	Rear of Unit 7	Permit Ref	PB3530RJ		
Operator/Permit holder	S B S Salvage Limited				
Regime	Waste Operations				
Date of assessment	30/04/2019	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	Kayeed Ahmed/ Director	Date issued	07/05/2019		

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)	A	
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	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
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	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

Officer Alex BOWDER attended SBS Salvage Ltd, CF63 2QN at 10:30 on Tuesday 30th April 2019 to carry out a routine inspection of permit **EPR-PB3530RJ**. Met with business Director Mr. Kayed Ahmed who accompanied the Officer around the yard and explained the business processes. Weather conditions were warm and dry at the time of visit.

PREVIOUS CAR FORM ACTIONS

- Send through an electronic copy of the business' EMS document – **Incomplete**

GENERAL OBSERVATIONS

An Administrative permit variation was issued on 08/01/19 to extend the permit boundary.

Status log of the permit		
Description	Date	Comments
Permit determined EPR/PB3530RJ	20/08/13	Original permit for Vehicle storage, depollution and dismantling (SR2011No3) issued to S B S Salvage Limited.
Application EPR/PB3530RJ/V002	Duly made 27/11/18	Administrative variation to increase permitted boundary.
Application EPR/PB3530RJ	02/01/19	Confirmation that revised boundary includes existing permitted area.
Variation determined EPR/PB3530RJ	08/01/19	Varied permit issued.

This has already benefited the housekeeping of the site by providing more room for storage and part stripping. No breaches were recorded on this inspection.

INFRASTRUCTURE AND DRAINAGE

The site interceptor was accessible and was said to be last emptied in December - no issues were apparent with the system at the time of inspection.

The Officer raised a drainage containment point of the storage area of the engines next to the depollution bay in times of heavy rainfall. The Operator mentioned that the site could bund the area to ensure the system is fully sealed and spoke about the slope gradient that would prevent run-off from leaving the site.

It was again good to see use of sawdust material to absorb spills and residual oil patches on the yard surface. The Officer questioned where the oil-soaked sawdust is stored once cleaned up and where this material is removed to. It was said this was done by a contractor.

Tyre storage seemed adequate and all removed engine batteries were stored in an appropriate container.

Repairs have been made to any weakened areas of flooring in yard. Please continue this good habit to keep the impermeable status of the infrastructure.

NEW PERMITTED AREA

The business has recently concreted a new area of the yard leading to the new depollution bay area. **This activity addition will need to be updated in your EMS and Site Plan.**

The newly permitted area is currently being used for storage of vehicles. No depolluting is going on in this area at present, however the business mentioned that they may wish to extend activities to depollute vehicles in this part of the yard. Officer stated that the site will have to consider the sealed drainage and impermeable infrastructure requirements of the permit.



Picture 1 – showing newly concreted surface ready for the second depollution bay

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 will be assessed against FPMP guidance criteria in the next few months.

WASTE RETURN DOCUMENTS

The business submitted its annual Waste Return document for 2018 on 07/03/19. Your permit requires the business to submit the information of waste accepted and removed by the business **within one month of the end of each year.**

Please see that the 2019 data this is submitted within the January 2020 grace period.

The spreadsheet states that 2,570 tonnes accepted by the site and 1,059 removed. All waste codes 16 01 __ are being correctly classified.

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

**Report ID:
CAR_NRW0035077**

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

Site	Rear of Unit 7	Permit Ref	PB3530RJ
Operator/Permit holder	S B S Salvage Limited	Date	30/04/2019

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	Please ensure the Waste Return document for 2019 is submitted within the January 2020 grace period.	30/01/2020

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.