

Compliance Assessment Report

Report ID:
CAR_NRW0035196

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	04/06/2019	Time in	14:30	Out	15:10	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Bowder, Alex					
Accompanied by						
Recipient's name/position	Kayleigh Parsons/ Director	Date issued	05/06/2019			

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	C3	Table 5.1 d) i)
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	X	
F1 - Amenity - Odour	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	C4	6.1.2

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	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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

Officer Alex BOWDER attended RDA Recycling Ltd, NP11 6AN at 14:30 on Tuesday 4th June 2019 to carry out the Quarter 1 2019 inspection of permit **EPR- NP3895FH**. The weather conditions were wet at the time of visit. Met with business director Kayleigh Parsons and walked around the yard highlighting any areas of interest.

PREVIOUS CAR FORM ACTIONS

- Do not store parts on top of drain openings - **Complete**
- Use of site diary – **Complete**
- Submit outstanding Waste Return spreadsheets – **INCOMPLETE**

CATEGORY 3 BREACH

B4 - INFRASTRUCTURE - CONTAINMENT OF STORED MATERIALS

TABLE 5.1 STANDARD FOR
PREVENTION & CONTROL OF LEAKS
AND SPILLAGES

d) control and remediation of leaks
and spillages

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 placed in alternative
containers."*

There was a lot of residual oil and fuel witnessed on the yard floor at the time of inspection. This was washing into the drains due to the amount of rainfall (Image 1).

Secondary containment measures must be put in place to ensure that that vehicle fluid does not reach the drains. This involves constructing bunding around the depolluted engines/parts stored, to capture any residual liquids that wash off.

ACTION:

Implement and install secondary containment measures around depolluted parts to prevent contaminants from reaching the drainage system.



Image 1 - showing diesel on yard surface flowing towards the drain taken at 14:45 on 04/06/19

CATEGORY 4 BREACH

G4 - MONITORING AND RECORDS, MAINTENANCE AND REPORTING – REPORTING AND NOTIFICATION TO NATURAL RESOURCES WALES

Condition 6.1.2

“A summary record of the waste types and quantities accepted and removed from site shall be submitted to the Agency within once month of the end of the year”

Waste Returns for 2018 have still not been submitted to NRW. This was raised on CAR Form **CAR_NRW0034839**.

It has been stated that they will be submitted within 10 days. If this is not actioned, it will escalate the breach of this condition.

ACTION:

Please submit completed Waste Return spreadsheet immediately to:

waste.returns@cyfoethnaturiolcymru.gov.uk

Site diary entries has been made which is good to see. The movement of the office unit has been completed.

SECONDARY CONTAINMENT

Secondary containment measures are used on plant as a second line of defence for preventing, controlling or mitigating hazards. The most common are:

Bunds, Drip trays, Interceptors/Sumps, Expansion vessels, Double skinned tanks/vessels, Concentric pipes, Building structures.

More information regarding bunds can be found on the Health and Safety Executive website:

<http://www.hse.gov.uk/comah/sragtech/techmeascontain.htm>

There were lots of depolluted engines on site at the time of inspection. Please see that there is a system in place to see that these are managed.

The bailer is still being used to crush vehicle shells for ease of transport. The Officer asked what containment measures are in place to prevent liquid leaving site along the east boundary where engines are stored. The site must ensure no run-off leaves the site boundary in this manner.

The drains were clearer and seemed to be flowing, which is an improvement on last inspection. Tyre storage has remained similar to last inspection. The business has said that it is still waiting for a collection; please see that no more than **20 cubic metres** are stored at any one time on site.

WAMITAB QUALIFICATION

The Technically Competent Manager for the site is still Kayleigh Parsons. The WAMITAB qualification expired on 15/05/19 and so the Continuing Competency assessment is now required to keep it valid.

The Operator has provided confirmation that the test is being taken date of 28th June 2019. Please notify NRW of the result once competed.

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	04/06/2019

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	C4	Submit 2018 return document immediately.	14/06/2019
C4	X	Improved tyre storage	05/07/2019
B4	C3	Implement and install secondary containment measures around depolluted parts to prevent contaminants from reaching the drainage system	05/07/2019

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.