

Compliance Assessment Report

Report ID:
CAR_NRW0032174

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

Site	Llantrisant Autos	Permit Ref	BP3695FA		
Operator/Permit holder	A Griffiths				
Regime	Waste Operations				
Date of assessment	06/09/2017	Time in	11:25	Out	13:00
Assessment type	Site Inspection				
Parts of the permit assessed	All Site				
Lead officer's name	Sherratt, Kelly				
Accompanied by	Lewis, Kirsty				
Recipient's name/position	A Griffiths / Director	Date issued	19/09/2017		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	C2	C8
B3 - Infrastructure - Site drainage engineering (clean and foul)	C2	C11 Site draiange (page 11 Permit BP3695FA)
C4 - General Management - Storage, handling labelling and Segregation	C3	C17 Wastes shall be stored and segregated

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	3	Total compliance score (see section 5 for scoring scheme)	66
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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

Unannounced site visit to site with NRM Officer Kirsty Lewis.

Weather cool, dry and windy.

Site Inspection findings

Walked over site unaccompanied after signing in to office. There has been a period of time since my last visit as I have been off line regulating 2 HPI sites.

Walked to rear of the site and there was significant standing water in all of the onsite drainage channels, it appears that the drainage is blocked, and not operating in accordance with the EMS or permit requirements.

To the rear of the site there is a significant number of bailed vehicles stored on made up ground, surrounding the foot of these crushed vehicles is a significant large pool of standing contaminated water. Strong smell of oil/diesel noted when stood near the pool, depth across pooling over ankle depth. There is no apparent barrier to prevent this oily liquid from entering the ground, the site occupies land running adjacent to the River Ely near Ynysmaerdy. The location of this site and the volume of heavily polluted water poses a significant risk to the River Ely.

(B1) Cat 2 Breech for permit condition C8

"C8 permit condition requires all areas used for storage or processing at the facility shall consist of an impermeable pavement that is able to withstand penetration by substances handled and vehicles that use the Facility. All impermeable pavements which are out doors should have an impermeable barrier consisting of raised impermeable kerbs. Additionally, the area should be served by surface water drainage which is part of the sealed drainage system."

B3 Cat 2 breach for permit condition C11

Not only is this a requirement to the rear of the site, if waste is going to be stored pending collection, but the actual vehicle dismantling area outside the workshop. The site permit states...."Site drainage shall be constructed and maintained". There does not appear to be any attempt to repair or maintain the drainage channels, which from appearance seem to be blocked and overwhelmed.

C4) Cat 3 breach for permit condition C17

Storage of tyres behind workshop, and around site, tyres need to be stored in such a manner that they do not pose a fire risk. Quantities of stored waste tyres need to be reduced.

Significant volume of depolluted vehicles stored on metal racks, with no capacity for additional car shells.

EMS update required There is an inaccuracy throughout the entire EMS document that NRW hold on record "EMS 6.4 No surface waters close to site", and there are inaccuracies in the Environmental risk assessment throughout Section 10. The EMS will need to be updated to reflect that the site runs adjacent to River Ely, and would be considered a potential risk.

Conclusion and actions required Overall the site is in a very poor condition, with the drainage on site not fully working and large areas of waste oily water that needs to be removed off site immediately. This request has been sent via email to the site, and the site have confirmed that Egan waste have tankered the liquid off site. Detail on the drainage plan for site needs to be submitted, as there seems to be some differences between the permit requirements and the EMS detail. EMS states outfall to land drains?? I need clarification of what system the site are using, and if as stated by Mr A Griffiths it is via interceptor to soak away, I would like detail on the interceptor maintenance regime and detail of the size and location of the soak away please.

All other works to be submitted in a scheduled timetable and agreed in writing by myself by or before W/c Monday 2nd October 2017

Any questions with this inspection report form please contact myself Kelly Sherratt on 07967107745 or 03000 653080 or via email at Kelly.sherratt@cyfoethnaturiolcymru.gov.uk

EPR Compliance Assessment Report

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Site	Llantrisant Autos	Permit Ref	BP3695FA
Operator/Permit holder	A Griffiths	Date	06/09/2017

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
C4	C3	All wastes and items for resale need to be stored in such a manner that they do not give rise to pollution, or high fire risk.	09/11/2017
B3	C2	Oily water pooling at the rear of the site, from bulked up scrap needs to be removed with immediate effect, as large pool stood on made up ground.	09/11/2017
B1	C2	Repair and on-going maintenance regime of all impermeable pavements.	09/11/2017

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.