

Compliance Assessment Report

Report ID:
CAR_NRW0035509

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	14/06/2019	Time in	13:10	Out	13:45
Assessment type	Site Inspection				
Parts of the permit assessed	Specified Activities				
Lead officer's name	Palmer, Richard				
Accompanied by					
Recipient's name/position	Andrew Griffiths/ Owner/Operator	Date issued	02/08/2019		

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	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
E2 - Emissions - Land and groundwater	A	
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

Environment officer Richard Palmer completed a site inspection on Friday 14th June 2019 to undertake a follow up site inspection to assess your continued compliance with the Regulation 36 notice that had been in place on your site. I was shown around site by the father of your technically competent manager, Andrew Griffiths.

Thank you for taking the time to show me around site. I was happy to see that the site was being kept in good condition and that all the progress that has been made in line with your notice, was still in place and the site looked to be being well managed.

Notes

Impermeable surface

There was still the small pile of waste left on the unmade ground at the back of your site and this last bit still needs to be removed to be in line with your notice, I was advised by you that this last quantity of remaining soil needed to be tested before it could be removed from site. It has been here for over 12 months now, so NRW will stipulate a period of no longer than 6 months (from June 25th) for the remaining soil to be removed, if the soil remains after this period then you may incur a breach of your Permit. I hope that you find this extension manageable and practicable and if you have any issues with this time limit please contact your site officer. Once the remaining soil has been removed, please provide the relevant waste transfer notes to demonstrate this.

As discussed previously on site and again on this visit, your permit only allows waste storage on an impermeable surface, as such no waste should be stored on the hardstanding surface – otherwise a new permit or permit variation must be applied for.

Drainage system

At the time of my site visit it seemed that all drains on site, upon inspection were running clear and it seemed that the drainage system was working effectively. However, it was noted that along the one drainage channel, in place from the front of the workshop, was collecting debris and some oily liquids. This was as this drain was uncovered, and it was re-iterated to Andy Griffiths' father at the time of the site visit, that you will need to ensure these drains will be regularly inspected and maintained (cleared), to ensure that the debris doesn't enter the system and cause blockages.

Training and training records

As per the last site visit regarding training of employees, all employees I spoke to on site seemed informed and keen to run the site correctly and implement the changes as advised by NRW through the Section 36 notice. The site seemed to be being maintained to these new standards and hopefully this will be maintained, and further improvements made where possible. Please continue to familiarise yourself with your environmental permit and environmental management system (working plan) so you and your staff are able to recognize environmental risks and prevent potential mismanagement of waste on site.

If you have any queries relating to your environmental permit or this form, please do not hesitate to contact me on the details below.

Richard Palmer

Richard.palmer@cyfoethnaturiolcymru.gov.uk

Office Tel: 03000653799

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	A Griffiths	Date	14/06/2019

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.

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 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.