

Compliance Assessment Report

Report ID:
CAR_NRW0033197

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	09/04/2018	Time in	14:00	Out	14:30	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Bowder, Alex					
Accompanied by	Matalynski, James					
Recipient's name/position	Kayleigh Parsons/ Director	Date issued	13/04/2018			

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	C3	Table 5.4 b) iii)
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Officers Alex BOWDER and James MALATYNSKI attended RDA Recycling Ltd, 3 Commercial Lane, Risca at 14:00 on Monday 9th April to carry out a routine inspection of permit **EPR-NP3895FH**. The weather was mild and slightly wet at the time of visit. Met with business representative Kayleigh Parsons and walked around the yard discussing site operations.

ACTIONS FROM LAST CAR FORM

- (1) Move car engines under cover – **Complete**

We were pleased to see that this has been actioned and these parts have been moved under the shelter on an impermeable surface. This will help prevent rainfall from washing through the scrap and washing off any residual oil and diesel left on the parts.

- (2) Amend Environment Management System (EMS) to reflect safe tyre storage - **Incomplete**
- (3) Update Fire Plan – NRW have not received an amended Fire Plan from the site - **Incomplete**

Permit Transfer

The business successfully transferred the permit on 05/02/18 from J & M Autosalvage to Kayleigh Parsons, whose principal office and regulated facility is located at Yard 3 Commercial Lane.

Status log of the permit		
Description	Date	Comments
Waste Management Licence issued EAWML 30327	10/05/04	Original waste management licence issued to Jeffrey Andrew Richards and Michael Leslie James.
Application EPR/NP3895FH/T002	Duly made 02/01/18	Application to transfer the permit in full to Kayleigh Parsons.
Transfer determined EPR/NP3895FH	05/02/18	Full transfer of permit complete.

Breach - Category 3

C4 - General Management - Storage, handling labelling and Segregation

Table 5.4 - Standards for handling and/or storage of residual wastes.

b) iii) "Lead acid batteries shall be

Car batteries were witnessed being stored outside of a container on the floor during the inspection.

Batteries must be stored in a suitable container as per your permit condition to safeguard against any risk of pollution. Please ensure this is done in future.

stored in containers with an impermeable, acid resistant base and a lid to prevent ingress of surface water”.

Action: Store all batteries in an appropriate container.

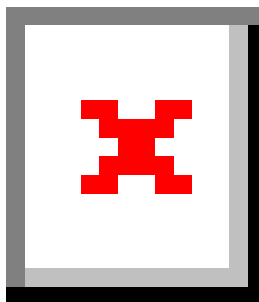


Picture 1 – showing car batteries stored outside of container

Tyre storage

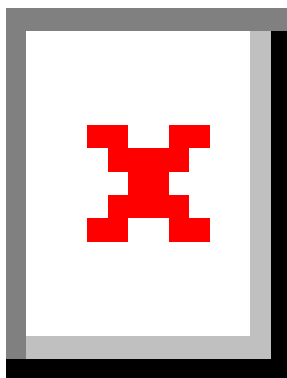
As discussed on site tyres were being stored very closely to the depollution bay. This is deemed a fire hazard and a clear distance should be established between the unit and tyres. As flagged on last inspection, it is a condition of your permit to conduct safe and appropriate tyre storage principles - stacking six metres apart and at least ten metres away from areas operating metal cutting activities.

These storage principles should be reflected in your EMS document. We recommend liaising with staff and altering operations so that this is adhered to.



Picture 2 – showing tyres stacked next to shelter wall

Action: Move and store tyres away from the unit. Update EMS document to indicate storage procedures.



Picture 3 – showing metal parts stored in a skip with patches of oil on the floor

Any oil/diesel that is visible on the yard floor should be cleaned up using absorbent pads or your site spill kit immediately. Oil was seen in multiple patches across the yard. Better efforts must be made to prevent and clean up hazardous liquids on site - these have the potential to get washed towards the drains in times of heavy rainfall and leave the site. We will be checking the use of your spill kits (that should be in your clean up procedures diary) upon next inspection.

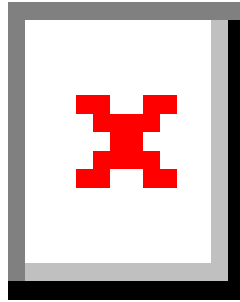
Action: Use and log spill kit clean ups on site

GENERAL OBSERVATIONS

New signage labelled RDA Recycling Ltd has been put up on the front gate. Kayleigh is still the active Technically Competent Manger for the site. The business mentioned that they experienced two break ins within a short period of time recently. The perimeter fence was looking sturdy and will prevent any waste from falling off the site boundary.

Waste Electrical and Electronic Equipment (WEEE)

Your permit does not allow for the storage of Waste Electrical and Electronic equipment (WEEE) such as, fridges, washing machines and microwaves. A fridge and electric cooker was present in the yard during inspection; please be aware that you are NOT permitted to store or treat this waste stream. Please see that these are removed and not accepted onto site in future.



Picture 4 – showing WEEE stored on site

INFRASTRUCTURE AND DRAINAGE

The business is still awaiting results of the **drain survey** conducted last month. It is said that the site is waiting for permission to gain access to the neighbouring yard's section of the system. It is important to find out the results of this to discover whether the discharges from the site are going to foul or surface water.

We also spoke about creating a lip or bund around the work areas to prevent run-off from reaching the drainage channel with ease.

Your permit states the site should be equipped with a three-chamber oil interceptor, which should be maintained accordingly. The interceptor or tank installed is meant to be the last resort for collecting pollutants and so better efforts must be made to see that potentially contaminated liquid and surface run-off does not enter the drain.

WASTE RETURN DOCUMENTS

It was recorded that 457 tonnes of waste were removed from the site for the final Quarter 4 of 2017 - being coded under metal recovery activities. The Quarter 1 waste return for the period of January to March 2018 is now due.

If you have any issues with this report please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033197**

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Site	RDA Recycling Ltd	Permit Ref	NP3895FH
Operator/Permit holder	Kayleigh Parsons	Date	09/04/2018

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			
C4	C3	Store all batteries in an appropriate container.	20/04/2018

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.