

	EPR Compliance Assessment Report	Report ID: 30095/0239198			
This form will report compliance with your permit as determined by an NRW officer					
Site	Olivers Sales & Rentals		Permit Ref	EAWML 30095 EPR/WP3799FB	
Operator/ Permit holder	Mr Paul Jones And Mr Roger Jones				
Date	30/04/2015		Time in	10:30	Out 11:00
What parts of the permit were assessed	Storage and handling				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op X	Water Discharge
Recipient's name/position	Roger Jones				
Officer's name	William Powell, Alex Bowder		Date issued	14/05/2015	

Section 1 - Compliance Assessment Summary					
This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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				Condition(s) breached	
a) Permitted activities	1. Specified by permit	C3		2.1.1;	
b) Infrastructure	1. Engineering for prevention & control of pollution	N			
	2. Closure & decommissioning	NA			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	N			
	5. Plant and equipment	N			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	C3		1.1.1	
	3. Materials acceptance	A			
	4. Storage handling, labelling, segregation	C3		2.1.1;	
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	N			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	NA			
f) Amenity	1. Odour	N			
	2. Noise	N			
	3. Dust/fibres/particulates	N			
	4. Pests, birds & scavengers	N			
	5. Deposits on road	N			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N			
	2. Records of activity, site diary, journal & events	A			
	3. Maintenance records	N			
	4. Reporting & notification	N			
h) Resource efficiency	1. Efficient use of raw materials	NA			
	2. Energy	NA			
KEY: C1, C2, C3, C4 = CCS breach category (*suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored					

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	12
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Breaches

A1: Specified activities - Breach of condition 2.1.1

"The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit."

Waste plasterboard stored outside of permit boundary. - Waste stored outside of permit boundary

Category 3 breach

C2: Management - Management Systems & Operating Procedures - breach of condition 1.1.1;

"The operator shall manage and operate the activities:
(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of compliant;"

Environmental management system in place is not effectively tackling repeated non compliances such as waste being stored off the concrete pad, and outside the permit boundary.

Category 3 breach

C4: Management - Storage, Handling, Labelling & Segregation - breach of condition 2.2.1;

"The officer is only authorised to carry out the activities specified in schedule 1 table S1.1 (the activities)"

Waste stored and treated off the concrete pad, therefore not benefitting from sealed drainage, including green waste which was not stored inside a skip

Category 3 breach

Site attended by officers Will Powell and Alex Bowder. During the inspection it was noted that a plasterboard skip was stored outside of the permit. Please ensure that plasterboard is stored within your permit boundary, ideally in a covered skip. You were breached for this non-compliance back in January and back in April last year (2014), therefore an additional breach has been given under the management conditions, as your management system is failing to resolve this problem.

There was a lot of waste stored onsite. Mixed waste was stored off the edge of the concrete pad, and was being tracked again. Your permit requires you to minimise the amount of waste going for disposal, however by crushing the mixed waste you are making it's recovery difficult. Whilst I understand you simply intend to protect the concrete from heavy machinery, you could be causing an additional cost on the business by increasing the amount for disposal.

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

Site	Olivers Sales & Rentals	Permit	30095
Operator/ Permit	Mr Paul Jones And Mr Roger Jones	Date	30/04/2015

Section 2 – Compliance Assessment Report Detail

The volume of rubble of soil was very high during our visit. Whilst we have not received any complaints about the waste onsite, please be mindful that your site is adjacent to housing, who may not appreciate having the waste piled so high.

No skip was available for the green waste whilst onsite, so was stored on the hard standing. Green waste, such as grass cuttings, quickly rot, especially in the warm weather. Any run off from this material can cause a pollution to nearby watercourses.

Site would benefit from a tidy in other areas, as there was a lot of waste inbetween the roll on skips.

Section 3- Enforcement Response		Only one of the boxes below should be ticked
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.	☒	X
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.	☐	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	☐	

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
A1	C3	Remove plasterboard skip outside of permit boundary	22/05/15
C2	C3	Amend working plan/management system so it effectively tackles the issues underlying repeated non-compliances	N/A
C4	C3	Remove any mixed waste off the concrete pad, and stored any green waste in a skip	N/A

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 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 which 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 fulfill 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.