

Compliance Assessment Report CAR_NRW0040478

Permit being assessed: CB3197HF.

For: Davies Motors, held by Mr Gareth Lloyd Davies and Mr Arwyn Lloyd Davies
At: Mill Garages, Betws Gwerfil Gich, Corwen, LL21 9PU.

Type of assessment carried out: Site Inspection, Reason: Other.

On 29/09/2022 between 14:06 and 15:30.

Parts of permit assessed: FPMP

NRW Lead Officer: Kathryn Bradshaw, accompanied by Steven White.

Report sent to: Gareth Davies & Arwyn Davies, Site Owners on 19/10/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D2 - Incident Management - Accidents, emergency and incident planning	Action only (X)	
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Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
D2	Purchase and ensure you have training on all equipment in the FPMP as well as drain/spill mats	11/11/2022
D2	Update FPMP to include all site drainage, available water supplies, site activities, site emergency contacts and material storage	11/11/2022
D2	Ensure the integrity of the pit within the building to ensure no polluting liquids can escape	11/11/2022
D2	Site plan including drainage and FPMP to be kept in an emergency box at the entrance to the site	22/12/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was a pre-arranged site inspection to meet with North Wales Fire and Rescue Service and consultant, Marco Muia from Oaktree Environmental Ltd who will act as the TCM for the site once it becomes operational.

The site inspection was arranged at the request of Davies Motors to discuss the removal of waste vehicles on the site and the next steps to becoming an operational site.

Dave Roberts from North Wales Fire and Rescue Service met us on site to discuss the site's FPMP and what their requirements were for the site to commence operations.

On arrival at site we were met by Gareth and Arwyn Lloyd-Davies with their employee in front of the building that will be used to de-pollute the vehicles. Significant progress has been made to clear this building to ensure it's suitability for this activity.

De-pollution building showing self-bunded tanks, battery storage box and spill kits



Immediately outside the de-pollution building is a surface water drain that drains to the roadway and then into a brook. As the building has a pit which appears to be sealed it appears extremely unlikely a spill during the de-pollution activities would flow outside the building and into the surface water drainage. However it was discussed that if a fire occurred within the building then there would be significant fire water run off which could run out of the building and into the surface water drainage.

The FPMP explains that a boom would be deployed in this instance but it was also recommended that dammit mats should be purchased to prevent any fire water entering the surface water drains. Water supplies to extinguish a fire were also discussed. There is a fire hydrant located approximately 130m away from the site.

The FPMP needs to be updated to show the location of all site drainage, emergency procedures and contacts in the event of fire including fire water run off and water supplies available to fight a fire on site. An emergency box with the site plan and FPMP was also recommended to be installed at the site entrance.

Progress has been made on the rest of the site with secure fencing installed along the right hand side of the site which is adjacent to residential property. Once more of the waste vehicles are removed then further fencing can be installed along the rest of the site's perimeter.

Installed secure fencing



Some of the waste vehicles have been removed in order for the fencing to be installed. The removal of the rest of the historic vehicles will be dealt with separately to this CAR form by way of a notice.

CCTV cameras have been installed to cover the de-pollution building and the secure gate at the entrance to the storage area. Further cameras will be installed where the waste vehicles are currently being stored to cover the rest of the site. The cameras can be remotely monitored 24 hours a day, however they currently do not have an alert set up on them as yet.

During the inspection the cutting of waste vehicles was discussed. Your permit states the following:

Treatment consisting only of depollution of waste motor vehicles and sorting, separation, baling, compacting, or cutting using hand-held equipment only, of waste into different components for recovery.

You must ensure you comply with all conditions of your permit.

During the inspection Davies Motors were again advised to contact Denbighshire Council to ensure the correct planning is in place before operations begin.

Thank you for your time during the inspection.

Kind Regards

Kathryn Bradshaw

Swyddog Rheoleiddio Gwastraff Peryglus (GD)/ Hazardous Waste Regulation Officer (NE)

Cyfoeth Naturiol Cymru/ Natural Resources Wales

Ffôn/ Phone: 03000 65 5191

Ffordd Caer, Bwcle. Sir Fflint. CH7 3AJ / Chester Road, Buckley. Flintshire. CH7 3AJ

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.