

Compliance Assessment Report CAR_NRW0041034

Permit being assessed: EP3295FZ.

For: Pengam Partmart, held by Ian Charles Jenkins

At: Tir-y- Berth, Hengoed, Caerphilly, CF82 8AU.

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

On 30/01/2023 between 09:30 and 10:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Alexandra Tennant.

Report sent to: Mr. Ian Charles Jenkins, Technically Competent Manager / Owner on 07/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	

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
G4	Submit 2022 annual waste to NRW	28/02/2023

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 report details the site visit made on the 30th January 2022 to Pengam Partmart, permit reference number EPR/EP3295FZ. Natural Resources Wales (NRW) Officers Greg GARDNER and Alexandra TENNANT attended the Pengam Partmart site at Tir-Yr-Birth, Hengoed, Caerphilly, CF82 8AU for a routine site inspection at 09:30am where we met with Mr. Ian Charles JENKINS (Technically Competent Manager / Owner). The weather was dry and reasonably cold. Mr. JENKINS was very hospitable and cooperative during our inspection.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

PERMIT HISTORY

See below extract from permit regarding variation history.

Status log of the permit

Description	Date	Comments
Waste Management Licence issued EAWML 30342	21/02/05	Original waste management licence for Vehicle Depollution and Dismantling (Authorised Treatment) Facility issued to Ian Charles Jenkins and Margaret Jenkins.
Licence transferred via an informative	28/07/08	Transfer of licence from Ian Charles Jenkins and Margaret Jenkins to Ian Charles Jenkins
Variation issued EPR/EP3295FZ/V002 (formerly EAWML 30342)	21/11/10	Variation to increase the permitted boundary
Variation application EPR/EP3295FZ/V003	Duly Made 16/06/15	Operator led variation to increase the annual throughput of the site.
Variation issued EPR/EP3295FZ	02/07/15	Varied and updated permit for an ELV Depollution and dismantling facility issued.

GENERAL OBSERVATIONS

Pengam Partmart operate under a Tier 3 bespoke environmental permit for an End of Life Vehicle (ELV) depollution and dismantling facility based on standard rule set SR2010_No12. This site consists of treatment operations that are limited to manual and/or mechanical sorting, separation, depollution, dismantling and compaction of waste vehicles and components. The site was in operation at the time of the visit with depolluting activities taking place. No waste of any type was stored outside of the permit boundary. There were numerous stockpiles of disused vehicles stored on site outside in the open. Site security was not an issue due to fencing located all around the property which was electrified to deter trespassers.



Photo 1 - Safe storage of vehicles on site

DRAINAGE AND INFRASTRUCTURE

Within the housing of the building where the depollution of vehicles were taking place there was impermeable concrete flooring which was linked to the sites interceptor drainage system and was in good working condition. Outside in the yard, there were no concerns regarding the integrity of the impermeable concrete flooring. Pengam Partmart are continuing of making further improvements to concrete the site fully which is positive to see (see photo 1 and photo 2). The cars in the yard were depolluted and awaiting further processing (see photo 3).



Photo 2 - Further planned on site improvements with regards to infrastructure



Photo 3 - Heavy machinery further processing cars for baling

END OF LIFE VEHICLE (ELV) WASTE - DEPOLLUTION & STORAGE

The depollution bay was in good working order with all vehicle fluids stored within the appropriate storage containers ready for safe disposal (as seen in photo 4). On average 10-15 vehicles a day are depolluted via this process. There were no concerns regarding the storage of ELV liquids with no loss of containment or excess ELV liquids present or witnessed.



Photo 4 - Depollution bay in good working order at Pengam Partmart



Photo 5 - Depollution bay in good working order at Pengam Partmart

On the previous site inspection conducted by NRW Officers on 12/05/22 (CAR_NRW0039915), it was noticed, whilst within the depollution bay, a large quantity of car batteries located not within the dedicated secondary storage containers and also in close proximity to where the depollution activities were taking place where there could be a potential fire risk. On this site inspection this was actioned and completed with batteries that were to be resold were stored ready for transport to the on site shop for resale (see foreground of photo 4).

The outside storage yard possessed a large quantity of depolluted vehicles which were of no concern to NRW Officers as they were spaced apart and if stacked, then no more than 2 vehicles high (see photo 2 and photo 6). There was no evidence of any loss of containment / visible leaks and the cars were to be either scrapped on site or auctioned. The housekeeping of the yard was good with no large amounts of loose debris present. No excessive noise was witnessed and with no offensive odours present.



Photo 6 - Depolluted vehicles stored safely at Pengam Partmart

WAMITAB

Mr. JENKINS has recently completed his WAMITAB refresher course on 27/01/23 with an expiry date of 27/01/25. Mr. JENKINS has submitted this certificate to NRW for our records.

WASTE RETURN DOCUMENTS

Pengam Partmart have yet to submit their annual waste return for 2022. As a reminder to the operator of when the deadline is for the submission of annual waste returns for their site to the NRW waste returns team.

Waste Return Submission Deadline

Annual Return Period	Deadline
1 January to 31 December	31 January the following year

ACTION ONLY: Please submit your 2022 annual waste return to NRW by 28/02/23.

NRW officers Greg GARDNER and Alexandra TENNANT left site at 10:30am.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

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

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.