

Compliance Assessment Report CAR_NRW0041286

Permit being assessed: EP3997EX.

For: Cambrian Autoparts Northwest Limited, held by Cambrian Autospares Ltd

At: Glan-y-morfa Industrial Estate, Marsh Road, Rhyl, Denbighshire, LL18 2AD.

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

On 15/02/2023 between 10:50 and 11:35.

Parts of permit assessed: Site drainage engineering, materials acceptance, waste returns, Management systems and operating procedures, Storage of waste

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Ian Thomas2.

Report sent to: Sue Beach, owner on 21/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3 Minor	4.2 of your permit the licence holder should operate the facility in accordance with the working plan. Condition 2.5 of the site working plan states that the drainage system shall be clear of any obstructions
B5 - Infrastructure - Plant and equipment	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

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
B3	Please remove all obstructions from the interceptor	Already completed

Criteria	Action needed	Complete by
B5	Please ensure there are spill kits available in the areas marked on your site plan. For immediate compliance.	22/02/2023
C4	As per condition 4.16 of your permit these wastes should only be stored in or on a suitable container to contain any leakage. They will be stored under cover or sheeted with tarpaulin or other waterproof materials to prevent rain washing. Action: Please ensure the parts are stored appropriately. For immediate compliance.	22/02/2023
G4	Should you accept batteries on site please ensure they are entered onto your waste return as a separate waste stream. For immediate compliance	22/02/2023

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

On Wednesday the 15th of February 2023 waste regulation officers Boguslaw Pierzchala and Ian Thomas, conducted a routine site visit.

The site was last visited by Natural Resources Wales (NRW) on 24th of September 2021, the previous inspection is detailed in Compliance Assessment Report: CAR_NRW0038807.

On arrival the officers were met by site manager Sue Beach.

It was raining at the time of inspection. The site was open with operatives performing their duties.

The yard was almost full with vehicles stored awaiting depollution or collection.

The yard is fully concreted and drains to an interceptor.

The drainage system has recently been updated and the location of the interceptor has been changed.

During the inspection it was noted that the interceptor was not readily accessible with cars stored on top.



location of the site interceptor

Action: You must ensure that the interceptor is kept clear of any obstructions, maintained regularly, and emptied when required. Please remove all obstructions.

The above action has been completed.

As per condition 4.2 of your permit the licence holder should operate the facility in accordance with the working plan. Condition 2.5 of the site working plan states that the drainage system shall be clear of any obstructions.

The obstruction of the interceptor was raised during the last visit. It has therefore been subsequently scored against the site permit as a CCS C3 breach.

Weekly checks of the interceptor:

Please contact your interceptor contractors to seek their advice on how to conduct your weekly checks.

Depollution area.

The depollution area was checked. It was apparent that the site had been busy with waste and parts accumulating in that area.

It was noted that no spill kits were stored in the fluid storage area as stated on the site plan.

Action: Please ensure there are spill kits available in the areas marked on your site plan.

For immediate compliance.

There has been no change since the last inspection regarding the activities on site.

During the inspection it was noted that car batteries were correctly stored indoors in a suitable container.

Outdoor storage

Officers saw a number of oily parts being stored outside. Some in a large skip and some in and on a metal container with no weatherproof cover.



oily parts stored outdoors with no cover

This was discussed with the site owner who stated a tarpaulin would be placed on top to prevent water ingress.

As per condition 4.16 of your permit these wastes should only be stored in or on a suitable container to contain any leakage. They will be stored under cover or sheeted with tarpaulin or other waterproof materials to prevent rain washing.

Action: Please ensure the parts are stored appropriately. For immediate compliance.

Waste returns:

The acceptance of waste has been discussed with the site owner. Occasionally, car batteries are accepted for their safe disposal.

A review of annual waste return submissions 2021 and 2022 for permit number EPR-EP3997EX has been completed and it shows that only end-of-life vehicles have been accepted (EWC 160104).

Action: Should you accept batteries on site please ensure they are entered onto your waste return as a separate waste stream. For immediate compliance.

Fire prevention and Mitigation Plan(FPMP)

Currently the site doesn't benefit from a Fire Prevention and Mitigation Plan. This has been discussed with

the site owner and advice and guidance offered.

Should you wish to discuss it further please contact me directly.

Thank you for your time during the inspection, please find my contact details below.

Boguslaw

Boguslaw.Pierzchala@naturalresourceswales.gov.uk

In this document 'Natural Resources Wales' means the Natural Resources 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.