

## Compliance Assessment Report CAR\_NRW0041494

**Permit being assessed:** WP3498FW.

For: Jab 93, held by Joyce Thomas

At: Brackla Ind Est, Bridgend, Glamorgan, CF31 2AJ.

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

On 22/02/2023 between 11:10 and 12:05.

Parts of permit assessed: All

**NRW Lead Officer:** Amy Bailey, accompanied by Jodie Baskerville.

**Report sent to:** Joyce Thomas, Permit Holder on 08/03/2023.

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

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition |
|------------------------------------------------|-------------------|------------------|
| A1 - Specified by permit                       | 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?

No action required.

### 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.

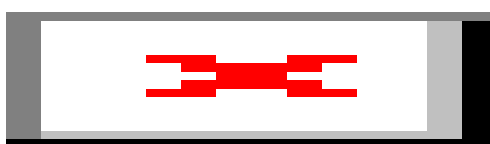
### 4. Details of our assessment

#### Introduction

Waste Regulation Officers Amy Bailey and Jodie Baskerville met with Diane Thomas, the technically competent manager (TCM) of Jab 93 and the daughter of the permit holder, Joyce Thomas. The visit was an unannounced site inspection of the bespoke permit WP3498FW.

Throughout the duration of the inspection the weather was overcast and dry.

Following each compliance visit NRW will produce a Compliance Assessment Report (CAR) detailing comments from the inspection. If NRW substantiate reasonably foreseeable risks or actual impact to the environment, non-compliances will be scored against the conditions of the permit. These non-compliances are scored on a Category 1 – 4 basis:



- 1 – A non-compliance that could have a major environmental effect
- 2 – A non-compliance which could have a significant environmental effect
- 3 – A non-compliance which could have a minor environmental effect
- 4 – A non-compliance which has no potential environmental effect

| 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   |

## Site Activities

The site dismantles end of life vehicles to sell spare parts.

Permit table 2.1 limits the type and quantity of waste as follows:

**Table 2.1 Specified end-of-life vehicle storage and treatment operations**

| Specified Operation                                                                                                                                          | Permitted Waste Types<br>(and European Waste Catalogue number) which may be subject to the Specified Operation | Limits on Specified Operations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>STORAGE</b>                                                                                                                                               |                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). | (i) 16 01 04 End of life vehicles **                                                                           | <ul style="list-style-type: none"> <li>Maximum storage capacity 100 vehicles stored on an Impermeable Pavement with a sealed drainage system at any one time.</li> <li>Vehicles shall only be stored on the area marked on the site plan referenced JAB01/02.</li> </ul>                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                              | (ii) 16 01 06 End of life vehicles (containing neither liquids nor other hazardous components)                 | <ul style="list-style-type: none"> <li>Maximum storage capacity 1000 vehicles at any one time.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                              | (iii) Residual wastes produced as a result of depollution or further treatment                                 | <ul style="list-style-type: none"> <li>Maximum storage capacity 50 tonnes, not exceeding 10 tonnes of hazardous waste. At any one time.</li> <li>Residual wastes arising from depollution of vehicle shall only be stored on the area marked on the site plan referenced JAB01/02.</li> <li>Maximum storage time of 1 year prior to disposal or 3 years prior to recovery</li> </ul> <p>The overall maximum storage capacity shall not exceed 1100 vehicles and 50 tonnes of residual waste, not exceeding 10 tonnes of hazardous waste removed from depolluted vehicles</p> |
| <b>TREATMENT</b>                                                                                                                                             |                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| R4: Recycling / reclamation of metals and metal compounds:                                                                                                   | (i) 16 01 04 End of life vehicles ** ( See Appendix A)                                                         | <ul style="list-style-type: none"> <li>40 vehicles per week</li> <li>Treatment of vehicles shall only be carried out on the area marked on the site plan referenced JAB01/02.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                     |
| R5: Recycling / reclamation of other inorganic materials                                                                                                     | (ii) 16 01 06 End of life vehicles containing neither liquids nor other hazardous components                   | <ul style="list-style-type: none"> <li>40 vehicles per week</li> <li>Treatment of vehicles shall only be carried out on the area marked on the site plan referenced JAB01/02.</li> </ul> <p>The overall annual through put of the site shall not exceed 2500 tonnes.</p>                                                                                                                                                                                                                                                                                                     |

## Site Infrastructure

Officers inspected the site surface and noted that the following action from the previous inspection had been complied with:

| Criteria | Action needed                                                                                  | Complete by |
|----------|------------------------------------------------------------------------------------------------|-------------|
| B3       | Repair site surface to restore even ground to prevent water puddling and potential site runoff | 23/07/2021  |

Some areas of the surface were again uneven and pooling rainwater. Diane showed us invoices from Breedon Quarry for previous, frequent deliveries of concrete as well as an upcoming delivery. Resurfacing is therefore due to be carried out imminently.

**Action - please provide NRW with photographs once the surface has been repaired.**

The site has two interceptors, these were not inspected as part of the visit. Officers viewed photographs of the interceptors being installed and invoices from Pureclean Environmental Ltd to show twice yearly removal of interceptor sludge and cleaning, the most recent being 13<sup>th</sup> January 2023.

Hazardous substances are stored in containers within a concrete bund and emptied by Pureclean Environmental Ltd. Invoices from Pureclean were readily available and viewed by officers. Spill kits and absorbent granules are easily accessible on site.

**Site record**

The site diary was available for inspection, was kept up to date and had records of relevant events.

Fire risk assessments were readily available for inspection, these are carried out annually by Kevin Harrison of Valley Fire Extinguisher Services. The most recent record was dated 3<sup>rd</sup> August 2022.

**Written Management System**

Officers viewed the working plan, a copy of which was readily available.

**Technically Competent Person**

Sufficient records for the Technically Competent Person, Diane Thomas were observed in respect of minimum site attendance and accepted industry schemes (WAMITAB and continuing competence certificate).

**Waste Returns**

Waste returns were up to date and officers were able to view. The Hazardous Waste Registration Report was valid at the time of inspection. Officers highlighted that the report expires on the 6th March 2023.

Officers viewed a variety of waste transfer notes including one showing the removal of tyres from Unipex aggregate recovery in January 2023.

**Summary**

Overall, it was noted that the site was well organised with general housekeeping of a good standard.

Thank you for your time.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Amy Bailey on 0300 065 3000, or via email at

[Amy.bailey@naturalresourceswales.gov.uk](mailto:Amy.bailey@naturalresourceswales.gov.uk)

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](mailto: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](mailto: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.