

Compliance Assessment Report CAR_NRW0043850

Permit being assessed: JP3394FA.

For: Harris Salvage, **held by:** Daniel Harris

At: Bangor, Gwynedd, LL57 4DA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 15/02/2024 between 11:00 and 11:50.

Parts of permit assessed: see below.

NRW Lead Officer: Daniel Grant.

Report sent to: Adele Lock, Site manager, on 24/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C4 No impact	4.2.1
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Action only (X)	
W4A - Waste - Information - Records	Action only (X)	
W2C - Waste - Operations - Operating techniques	C3 Minor	5.4.1
W4A - Waste - Information - Records	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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
W1A	Install a site identification board	03/06/2024
W2F	TCM requirements at the site is currently not being met, should the site re-open then a TCM is required	30/06/2024
W4A	Ensure that all site diary records and maintenance checklist is kept on site	30/06/2024
W2C	Remove tyres from site that are non-conforming	05/07/2024
W4A	send copy of consignment for the latest removal of catalytic converters from site	10/05/2024

Compliance 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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 an unannounced visit carried out on Thursday the 15th of February by Natural Resources Wales (NRW) officers Daniel Grant (Hazardous Waste Regulation Officer) and Ricky Hartleb (Tackling Waste Crime Officer).

Officers met with Wayne Robinson, site operative, at the yard who accompanied officers around site during the site inspection. Since the inspection a meeting was organised between Adele Lock, Liam Harris, Daniel Grant and Dafydd Williams (Waste Regulation Higher Education Placement) on the 26th of March 2024 at NRW's office, Maes y Ffynnon, Bangor, LL57 2DW. The purpose of this meeting was to discuss hazardous waste requirements but also to discuss site plans moving forward since Wayne Robinson no longer works for HARRIS SALVAGE LIMITED (HSL) since the site inspection.

Weather conditions throughout the site inspection was cloudy.

The hazardous waste premises registration was checked prior to the visit. HSL are currently registered as a hazardous waste producer (CAA912) until the 30th of November 2024, this is compliant with Section 21 of the Hazardous Waste Regulations 2005.

Site inspection

Officers inspected the site yard and the ELV depollution shed.

Depolluted ELVs were stored on shelves and on the ground. The quantities appeared within permitted levels.

Oil filters were being stored in a waste drum after being removed from ELVs.

Waste oils were being stored inside a waste oil drum inside the ELV shed. Quantities appeared low inside the drum, however, the latest consignment note from the site showed that oil had recently been removed from site the previous month.

Waste inputs into site was discussed and Wayne explained they only accept 5-10 ELVs per month.

Waste batteries were not stored appropriately whilst on site, these were stored in a plastic container that was broken. This container was not fit for purpose (Figure 1) and this was non-compliant with condition 5.4.1 of your permit. Upon finishing the visit Wayne had already secured an acid-resistant waste battery container and the batteries were moved into this container. As the non-compliance was rectified at the time this will only be an action on this occasion, however, failing to store waste batteries in a suitable container moving forward will likely incur a score.



Figure 1. waste batteries stored in containers not fit for purpose.

Waste tyres were identified to be stored across the edges of the site boundary. The storage of large quantities on site is currently posing a fire risk, especially considering that these have been on site for a considerable amount of time due to the vegetation growing in and around the tyres (Figure 2). A category 3 non-compliance has been applied and further details about this non-compliance can be found below. These tyres were prioritised and a plan for removal was discussed and agreed during the meeting on the 26th March 2024 between officers and Adele and Liam. These steps will help bring you back into compliance with this requirement.



Figure 2. Waste tyres with vegetation growth along site boundary

A site identification board was not present on the site entrance (Figure 3). Condition 4.2.1 specifies that “No end-of-life vehicles shall be received at the site unless an identification board is provided at or near the site entrance”. As a result of this non-compliance a category 4 non-compliance has been applied. Further details can be found below.



Figure 3. Site entrance with no site identification board.

Documentation

At the end of the inspection documentation was requested to be inspected at the site office. None of the required documentation was available for inspection on the day and these were requested via email following the site inspection. These included:

Waste removed from HSL:

- waste oils
- waste batteries
- waste catalytic converters
- waste tyres
- Site Diary showing inspection carried out by site TCM between October and November 2023
- Site inspection checklist carried out by site TCM during previous three visits.

The site diary was not present on site during the inspection. Moving forward the site diary must always be kept present on site for inspection. This is a requirement as per condition 6.2.1 of your permit.

Records of the movement of catalytic converters removed from site were not available during the inspection and took extended time for officers to receive in order to complete the inspection. The removal of this waste stream was discussed on site. It is important to highlight that catalytic converters are considered hazardous waste and consignment notes must be produced for the movement of this waste from site. This paperwork was further requested during the meeting on the 26th March 2024. NRW are yet to receive this consignment note, could you please ensure that this is **sent by the 10/05/24**. Failure to send this paperwork may result in us having to serve a statutory notice on HSL to require it.

As all waste documentation required for this inspection were hazardous waste consignment notes, findings from the inspection of these consignment notes will be detailed in a separate letter. This is because the Hazardous Waste Regulations 2005 is a separate piece of legislation to the Environmental Permitting Regulations 2016.

At the time of the inspection site Technically Competent Manager requirements were being carried out by Stephanie Critchley. Photos taken of the site diary by Wayne Robinson showed the site had been visited on two periods in November and October 2023. Moving forward the site should also be inspected more often, generally we expect a minimum of once a week depending on how often the site is open. Further guidance on this can be found here:

<https://naturalresources.wales/media/680335/how-to-comply-with-your-environmental-permit.pdf>

Moving forward the site TCM should carry out site maintenance checklists in order to assess the site against the permit conditions. There was no record of this.

Following our meeting on the 26th March 2024 we understand the site will now be closed until around June 2024. It is important to highlight that as per condition 2.3 a TCM must be in place at the site in order to carry out any waste activity. We have checked the CIWM WAMITAB database and have confirmed that Adele Lock is currently sitting her CIWM WAMITAB qualification with HSEC Services. Please keep us informed as soon as Adele becomes qualified and the site re-opens.

Non-compliancesCondition 5.4.1

“Once removed from vehicles, these waste types shall be stored in separately designated areas provided with an impermeable pavement and sealed drainage. Individual tyre stacks not be stored within 10 metres of the site boundary or building”

This was not the case with the current storage of tyres on site which were all stored along the site boundary and not on impermeable surface. During the meeting at the office Liam and Adele agreed on a plan to remove the waste tyres from HSL

As a result, this is a non-compliance with condition 5.4.1 and a CCS breach 3 has been assigned.

Action- removal of waste tyres currently on site that are non-compliant.

Deadline- 05/07/2024

Condition 4.2.1

“No end of Life Vehicle shall be received at the site unless an identification board is provided at or near the entrance”

There is currently no site identification board at or near the site entrance. Discussions were had regarding this requirement with Adele and Liam and it was agreed that a identification board would be installed.

As a result, this is a non-compliance with condition 4.2.1 and a CCS breach 4 has been assigned.

Please ensure the site identification board contains the following (screenshotted directly from your permit):

- 4.2 **Provision of site identification board**
- 4.2.1 No end-of-life vehicles shall be received at the site unless an identification board is provided at or near the site entrance.
- 4.2.2 The board shall be easily readable from outside the site entrance in daylight hours, and shall display the following information:
- a** Site name and address;
 - b** Licence Holder name (company name, not individual name unless justified as necessary);
 - c** Operator name (company name, not individual name unless justified as necessary);
 - d** Licence number;
 - e** Emergency contact name and telephone number (for security reasons, personal names and home phone numbers should not be used);
 - f** Statement that the site is an Authorised Treatment Facility, licensed by the Environment Agency;

Deadline- 03/06/24

Summary

Non-compliances with two separate conditions were identified:

- Condition 4.2.1
- Condition 5.4.1

A CCS of 3 (score of 4) and CCS 4 (score of 0.1) has been applied for these non-compliances.

Therefore, your overall CCS score for this inspection is 4.01.

Further details about scoring can be seen in the table at the end of this report.

Actions and deadlines in order to bring you back into compliance have been outlined for each of these non-compliances. Actions have also been provided for other matters that were identified and these should also be adhered to in order to avoid further non-compliances moving forward. Please ensure that these actions are completed by the specified date. If you have any issues with these dates, please let us know as soon as possible.

If you have any further questions about the contents of this inspection report, please do not hesitate to contact us.

Yours sincerely

Daniel Grant

Hazardous Waste Regulation Officer

E-mail: daniel.grant@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.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.