

Compliance Assessment Report CAR_NRW0044913

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: Site Inspection,

Reason: Routine.

On: 08/08/2024 between 12:25 and 13:00.

Parts of permit assessed: General management, waste storage, waste returns, drainage system and interceptor.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Susan Beech, Owner, on 06/09/2024.

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	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor (Suspended)	Condition 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
W1A - Waste - Management - General management	C3 Minor	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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		under cover or sheeted with tarpaulin or other waterproof materials to prevent rain washing
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	
W1A - Waste - Management - General management	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

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	Action: Please ensure the layout is kept in accordance with you Environment management Plan. Please comply by the 31st of August 2024. Once completed, please send photographic evidence to your regulation officer.	31/08/2024
W1A	Action: Please ensure that spill kits are available at the locations indicated on Diagram A of the site's EMS. Please comply by the 31st of August 2024. Once completed, please send photographic evidence to your regulation officer.	31/08/2024
W1A	Please ensure the interceptor is accessible at all times. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.	23/08/2024
W1A	Please ensure the parts are stored appropriately. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.	23/08/2024
W1A	Ensure that all incoming waste is being stored on impermeable surface inside the permitted boundary. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.	23/08/2024
W1A	please ensure the site diary is kept up to date with relevant information.	23/08/2024

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.

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 is an updated version of the CAR form sent to the site owner on the 23rd of August 2024.

On Thursday the 8th of August 2024 NRW waste regulation officer conducted a routine site inspection.

The site was last visited by Natural Resources Wales (NRW) on 15th of February 2023, the previous inspection is detailed in Compliance Assessment Report: NRW0041286.

On arrival the officer spoke to Sue Beach, site manager, who accompanied the officer throughout the inspection.

It was dry and windy at the time of inspection.

The site was open with operatives performing their duties.

W1A General Management**Site layout**

The depollution area was checked and there was one vehicle being depolluted at the time.

It was noted that the building was almost full with parts, tyres, batteries and equipment. The manager stated they had been unusually busy recently.

The layout does not reflect what's been submitted in the site's most recent EMS (Environment management system) – Plan of Dismantling Area, diagram A.

Please see the below photos



dismantling area.

Action: Please ensure the layout is kept in accordance with your Environment management Plan. Please comply by the 31st of August 2024. Once completed, please send photographic evidence to your regulation officer.

Spill kits

It was noted that only one spill granules were available at the time of the inspection.

Action: Please ensure that spill kits are available at the locations indicated on Diagram A of the site's EMS. Please comply by the 31st of August 2024. Once completed, please send photographic evidence to your regulation officer.

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

The yard is fully concreted and drains to an interceptor.

During the inspection it was noted that the interceptor was not readily accessible with cars stored next to it blocking access. Please see photos below.



Site interceptor – blocked access

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 previous inspections.

It has therefore been subsequently scored against the site permit as a CCS C3 breach.

Action: Please ensure the interceptor is accessible at all times. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.

Storage of oily parts next to the building

Two open metal containers were seen containing a number of oily parts.

The parts were being stored outside with no weatherproof cover.

Please see the below photos.



oily parts stored in open

containers

This non-compliance has been raised with the site owner during previous inspections.

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.

It has therefore been subsequently scored against the site permit as a CCS C3 breach.

Action: Please ensure the parts are stored appropriately. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.

It was noted that two ELVs vehicles were stored on a grass verge, outside of the permit boundary.



Vehicles stored outside the

permitted area

It has been raised with the site owner who stated that the vehicles had been put there temporarily whilst rearranging the storage of ELVs on site. It was pointed out that waste can not be stored outside of the permitted boundaries.

Action: Ensure that all incoming waste is being stored on impermeable surface inside the permitted boundary. For immediate compliance. Once completed, please send photographic evidence to your regulation officer.

Waste returns:

A review of annual waste return submissions 2023 for permit number EPR-EP3997EX has been completed and it shows that only end-of-life vehicles have been accepted (EWC 160104). No issues were identified.

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

Thank you for your time during the inspection,

Boguslawa

Please find my contact details below.

Boguslawa.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.

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.