

Compliance Assessment Report CAR_NRW0045870

Permit being assessed: YP3194FU.

For: Flintshire Commercial Dismantlers, held by Sarah McGilloway

At: Station Road, Greenfield, Holywell, Flintshire, CH8 7EP.

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

On 18/12/2024 between 13:00 and 14:00.

Parts of permit assessed: waste storage, acceptance, EMS, FPMP, waste treatment

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Sarah Mc Gilloway, owner on 24/01/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W4B - Waste - Information - Reporting	C4 No impact	Condition 4.2.2 of your permit requires you to submit within one month of the end of each calendar year a summary of waste quantities and types accepted on to and removed from site for that year.
W1A - Waste - Management - General management	C3 Minor	Section 2.4.1 of the site permit states: The storage (including temporary storage) and treatment of waste motor vehicles shall meet the requirements of article 6(1) of the End-of-Life Vehicles Directive. 2. Sites for treatment: (...) appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts.
W1A - Waste - Management - General management	C3 Minor	Section 2.5.1 of the permit describes

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		improvement plans specified in table S1.3 stating that the site shall submit an Environment Management System (EMS) & FPMP to Natural Resources Wales for approval within 3 months of the permit being issued; that is by 01/02/2018.
W2E - Waste - Operations - Waste acceptance	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
3	8.1

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
W4B	Please submit the missing annual waste returns for 2023 to waste.returns@cyfoethnaturiolcymru.gov.uk no later than 31st January 2025.	31/01/2025
W1A	Action: Please ensure all oily parts are stored in appropriate container with weatherproof cover.	24/01/2025
W1A	Action: Please review, update and send the EMS to NRW for further assessment by the 25th of April 2025. Please ensure that the guidance included in How to comply with your environmental permit is implemented. Action: Please review, update and send the EMS to NRW for further assessment by the 25th of April 2025. Please ensure that the guidance included in Guidance No. 16 Fire prevention and mitigation plan - waste management is implemented.	25/04/2025
W2E	Please place all pressurised gas containers in a lockable cage prior to removal from site. Please provide photographic evidence of the cage in situ by the 31st of January 2025.	31/01/2025

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 18th of December 2024 waste regulation officer attended the site.

It was a routine, announced inspection. The site owner, Sarah McGilloway, was present on site during the inspection.

The weather was dry and windy. It had been raining prior to the inspection with rain water pooling in places in the back yard.

WAMITAB and waste returns were discussed with the site owner.

WAMITAB / Technically Competent Manager

At the moment, the site still benefits from external TCM cover.

Please ensure that TCM attends site at least once a week and their attendance is recorded in the site's diary. The records must be available for NRW to inspect.

Waste returns

Waste Return Review of the waste returns submissions for permit EPR-YP3194FU has been completed.

Condition 4.2.2 of the site permit requires you to submit within one month of the end of each calendar year a summary of waste quantities and types accepted on to and removed from site for that year.

Natural Resources Wales have not received any waste returns for the 2023. This will be scored as a C4 breach against the above-mentioned permit condition.

Action Required

Please submit the missing annual waste returns for 2023 to waste.returns@cyfoethnaturiolcymru.gov.uk no later than **31st January 2025**.

Please note that the 2024 waste returns are due by the same date.

Storage of waste

The officer walked around the site which was mostly well-kept and organised.

Most vehicle engines were stored indoors on impermeable surface.

Several engines and oily parts were seen stored on the ground and some in metal containers; however, the containers did not have a weatherproof cover, please see the below photos.

This was discussed with Ms McGilloway as a re-occurring issue.



oily parts in a open skip



Oily parts stored on the ground, some partially covered

Section 2.4.1 of the site permit states:

The storage (including temporary storage) and treatment of waste motor vehicles shall meet the requirements of article 6(1) of the End-of-Life Vehicles Directive.

2. Sites for treatment: (...)appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts.

Action: Please ensure all oily parts are stored in appropriate containers with weatherproof

cover. **For immediate compliance.**

The storage of oily parts had been raised with the site owner on previous occasions.

This will be scored as a **C3** breach against the above-mentioned permit condition.

Management System and operating procedures

Section 2.5.1 of the permit describes improvement plans specified in table S1.3 stating that the site shall submit an Environment Management System (EMS) & FPMP to Natural Resources Wales for approval within 3 months of the permit being issued; that is by 01/02/2018.

The Environmental Management System (EMS) for the site is dated 10/10/2004.

Following the last site inspection on the 20th of September 2023 it was agreed that an updated version of the EMS would be submitted to NRW by the 1st of December 2023.

This action had been complied with; however, the updated version required further work and had been sent back to Ms McGilloway who stated that the subsequent updated version had been prepared; however, not sent to NRW by mistake.

The EMS was sent to the regulating officer along with the site Fire Prevention and Mitigation Plan during the site inspection. The date on the EMS received had the last updated version dated October 2024.

The latest version of the EMS has been assessed and is deemed insufficient with further work required. Subsequently this has been scored as a **C3 breach**.

Action: Please review, update and send the EMS to NRW for further assessment by the 25th of April 2025. Please ensure that the guidance included in [How to comply with your environmental permit](#) is implemented.

Details of the assessment will be sent separately.

Fire Prevention and mitigation Plan (FPMP)

The FPMP has been assessed and is deemed insufficient with further work required. Details of the assessment will be sent separately.

The score for breaching the above conditions has been **consolidated** into a **C3** permit breach.

Action: Please review, update and send the EMS to NRW for further assessment by the **25th of April 2025**. Please ensure that the guidance included in [Guidance No. 16 Fire prevention and mitigation plan - waste management](#) is implemented.

Details of the assessment will be sent separately

Fire extinguishers on site

The officer noted a number of fire extinguishers dotted around site. Please see the photos below.



Condition 2.3.2 states Waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table(s) S2.1 [, S2.2 etc.]

Table S2.1 Permitted waste types and quantities for vehicle depollution and dismantling (authorised treatment) facility

Pressurised gas containers are not listed on the site permit. They also pose a fire risk.

This was raised with the site owner who stated that they do not accept this waste stream; however they often find the extinguishers left/ fly-tipped outside the front gates or hidden in the ELVs accepted on site. The owner stated a lockable cage will be provided to store all pressurised containers securely pending their removal off site.

Action: Please place all pressurised gas containers in a lockable cage prior to removal from site. Please provide photographic evidence of the cage in situ by the **31st of January 2025**.

Also, please ensure all ELVS are thoroughly checked for the presence of any unpermitted waste.
Please ensure all fire extinguishers are removed from site and taken to an appropriately authorised facility.

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

Kind regards

Boguslawa Pierzchala

Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.pierzchala@naturalresourceswales.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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.