

Compliance Assessment Report CAR_NRW0046364

Permit being assessed: BB3190FA.

For: UK Salvage Car Parts Ltd, **held by:** UK Salvage Car Parts Ltd

At: Ridgewell Business Park, Ridgewell Way, Llwynypia, Tonypany, Rhondda Cynon Taf, CF40 2JP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 13/02/2025 between 12:20 and 13:10.

Parts of permit assessed: All.

NRW Lead Officer: Gareth Morris, accompanied by Craig Coleman, Andrew Prestt.

Report sent to: Alireza Ghabi, Site Manager , on 19/02/2025.

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 | C3 Minor | Permit Condition 1.1.1 |
| W1A - Waste - Management - General management | C3 Minor | Permit Condition 1.1.2 |
| W1A - Waste - Management - General management | C3 Minor | Permit Condition 1.1.4 |
| W2F - Waste - Operations - Technical requirements | C3 Minor | Permit Condition 2.3.1 |
| W2F - Waste - Operations - Technical requirements | C3 Minor | Permit Condition 2.5.1 |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 5 | 20 |

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 | Comply with EMS | 14/03/2025 |
| W1A | I informed the permit holder that it was vital that the site permit, environmental management system and other associated documentation is always available. As the permit holder had breached this permit condition, I informed them that they would receive a Category Three (3) breach for this breach of permit condition. | 28/02/2025 |
| W1A | I informed the permit holder that they were in breach of their permit and environmental management system (EMS) by not holding a WAMITAB certification. I instructed the permit holder that they must hold a WAMITAB certification to be compliant with their permit and environmental management system. I informed the permit holder that they would receive a Category Three (3) breach for this breach of permit. | 31/03/2025 |
| W2F | : I asked the permit holder to remove all the black scree off the concrete hardstanding and dispose of that waste correctly. I also asked the permit holder to repair damaged areas of the concrete hardstanding. I informed the permit holder, that they would receive a Category Three (3) breach for this breach of permit. | 30/04/2025 |
| W2F | I informed the operator that more time must be given to allow all pollutants to drip out of vehicles during the de-pollution process and that all necessary measures must be followed to adequately collect all pollutants correctly during the de-pollution process. I also informed the operator that a spill kit must always be available for use in the de-pollution area. I informed the operator that they would receive a Category Three (3) breach for this breach of permit. | 07/03/2025 |

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

UK Salvage Car Parts Limited Site Visit, Rhondda Cynon Taf (BB3190FA) – 13/02/2025

Waste Regulation Officer Gareth Morris accompanied by Senior Waste Regulation Officer; Craig Coleman and Carriers and Brookers Officer; Andrew Prestt visited UK Salvage Car Parts Ltd,

Ridgewell Business Park, Ridgewell Way, Llwynypia, Tonypany, Rhondda Cynon Taf, CF40 2JP on 13/02/2025 to conduct a routine site inspection and to assess compliance with environmental permit; BB3190FA

The operator holds a: **Standard rules SR2011No3-Vehicle storage, depollution & dismantling (authorised treatment facility)**

The site is an end-of-life vehicle site (ELV)

On arrival at site, we were met by a site attendant who contacted the site owner. The site owner was not available to join us on the site inspection. However, it was agreed with the site owner that once I had completed my inspection I would call him while still on site to give a brief breakdown of any breaches or actions that may arise following my inspection.

Weather on day of inspection, was clear, dry with little wind.

Breaches Recorded

W1A- General Management

Route Cause Breach 1.1.1

Permit Condition 1.1.1 (A) states: *The operator shall manage and operate the activities:*

- a. *In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of complaints.*

Permit Condition 1.1.2 states: *Records demonstrating compliance with rule 1.1.1 shall be maintained.*

During my inspection of the site, I asked for access to the permitted site's environmental management system (EMS) and all other paperwork relating the permitted site. I was told that the site office is locked, and no paperwork can be provided or accessed.

Action: I informed the permit holder that it was vital that the site permit, environmental management system and other associated documentation is always available. As the permit holder had breached this permit condition, I informed them that they would receive a Category Three (3) breach for this breach of permit condition.

Permit Condition 1.1.4 states: *The operator shall comply with the requirements of an approved competence scheme.*

I asked the permit holder for a copy of their WAMITAB certification, of which they informed me they did hold a WAMITAB certification.

Action: I informed the permit holder that they were in breach of their permit and environmental management system (EMS) by not holding a WAMITAB certification. I instructed the permit holder that they must hold a WAMITAB certification to be compliant with their permit and environmental management system. I informed the permit holder that they would receive a Category Three (3) breach for this breach of permit.

W2F Technical Requirements

Permit Condition 2.3.1 states: *The activities shall be operated using the techniques and in the manner described in Table 2.3 (1) Fully depolluted end-of-life vehicles, uncontaminated plastic, glass and ferrous and non-ferrous metal wastes arising from the treatment of end-of-life vehicles shall be stored on a hardstanding or an impermeable surface with sealed drainage system. All other wastes shall be stored on impermeable surface with a sealed drainage system.*

During my inspection of the permitted site, I noticed a black tarmac like scree on top of the concrete hardstanding. The black tarmac like scree was breaking away throughout all the permitted area and there was evidence of hydrocarbon pollutants throughout the site. In some areas of the permitted site, even the concrete hardstanding has been damaged with evidence of substantial rutting in places. There was also pooling of water contaminated with hydrocarbons through site.

Action: I asked the permit holder to remove all the black scree off the concrete hardstanding and dispose of that waste correctly. I also asked the permit holder to repair damaged areas of the concrete hardstanding. I informed the permit holder, that they would receive a Category Three (3) breach for this breach of permit.

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Photograph 1.1



Photograph 1.2



Photograph 1.3

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W2F Technical Requirements

Permit Condition 2.5.1 state: ***Removal and separate collection and storage of fuel, motor oil, transmission oil, gearbox oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle, unless they are necessary for the re-use of the parts concerned.***

While conducting my inspection of the permitted site, a car was in the process of being de-polluted in the de-polluting area. It was evident from the amount of hydrocarbon pollutants on the floor that there was a failure on the operator's part to allow sufficient time in which to allow vehicles to rest and drip long enough during the de-pollution process. Due to these factors, there are substantial amounts of pollutants across the permitted area.

Action: I informed the operator that more time must be given to allow all pollutants to drip out of vehicles during the de-pollution process and that all necessary measures must be followed to adequately collect all pollutants correctly during the de-pollution process. I also informed the operator that a spill kit must always be available for use in the de-pollution area. I informed the

operator that they would receive a Category Three (3) breach for this breach of permit.

Photograph 1.4



Photograph 1.5



Actions for permitted site improvements.

W1A General Management

Permit Condition 2.1.1 states: *The operator is only authorised to carry out the activities specified in table 2.1 (“the activities”) R4: Wastes shall be stored for no longer than one (1) year prior to disposal and three (3) years prior to recovery.*

During my inspection I seen a large number of vehicles stored at the south end of the permitted site, these vehicles had clearly gone through the de-pollution process and were just being stored, prior to being collected and move off site. During the time of inspection, the vehicles were stacked four vehicles high.

Action: I advised the operator not to store any vehicles more than four vehicles high. I also advised the operator that stored vehicles must be moved within a year of being on site. The operator informed me that vehicles are collected on weekly basis.

Photograph 1.6



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Permit Condition 2.3.1 states: *The activities shall be operated using the techniques and in the manner described in Table 2.3 below. (7) Spillage collection facilities shall be provided and used to deal with any spillage of vehicle fluids.*

A spillage bin kit is available on site, but was stored outside and away from the de-pollution area.

Action: I advised the operator that this spillage bin kit should always be in the de-pollution area.

Photograph 1.7



Areas assessed as compliant and other comments can be found below.

W2C-Operating Techniques

Permit Condition 2.2.1 states: *Wastes shall only be accepted if:*

- a. *It is of a type and quantity listed I table 2.2 and*
- b. *It conforms to the description in the documentation supplied by the producer and holder.*

The site accepts a number of waste codes. All waste was correctly segregated. There was no evidence of mixed/contaminated waste within any of the waste storage areas or containers.

Photograph 1.8



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Photograph 1.9

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W2E- Waste Acceptance

Permit Condition 4.2.2 states: *Within one month of the end of each year, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous year.*

The site accepts a number of waste codes. Quarterly returns for the previous quarter have been received on time. The Quarterly returns have been checked against the sites waste codes and are correct.

Summary

Thank you for taking the time to show myself and the other officers around the site. If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Gareth Morris

07966730983

Gareth.morris@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.

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.