

Compliance Assessment Report CAR_NRW0046555

Permit being assessed: DB3391CQ.

For: 1 Acre Farm, **held by:** G W Lewis & Sons Ltd

At: Springfield Hill, Pentre Halkyn, Holywell, CH8 8BA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/03/2025 between 10:50 and 11:30.

Parts of permit assessed: 1.1.1, waste storage, waste acceptance, security, infrastructure, permitted activities, waste returns.

NRW Lead Officer: Boguslaw Pierzchala.

Report sent to: Geraint Lewis, Owner, on 13/03/2025.

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	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	Permit condition 2.3 Operating techniques states: 2.3.1 The activities shall be operated using the techniques and in the manner described in Table 2.3 below. 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 hard standing or an impermeable surface with sealed drainage system. All other wastes

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		shall be stored on an impermeable surface with sealed drainage system
W4B - Waste - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	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	Please provide your EMS and FPMP for assessment	21/03/2025
W1A	Please ensure all undepolluted vehicles are kept on impermeable surface with sealed drainage	13/03/2025
W4B	Please revise and re-submit your waste returns for 2024 to waste.returns@cyfoethnaturiolcymru.gov.uk	31/03/2025

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

On Friday the 7th of March 2025 Natural Resources Wales (NRW) officers attended at G W Lewis & Sons Ltd site in Halkyn. This was a planned unannounced visit.

This was the first visit after the permit was granted November 2024.

Geraint Lewis, owner, accompanied officer throughout the inspection.

Mr Lewis shown officers around explaining the activities taking place on site.

The site is secure with appropriate fencing, two lockable gates and a 24/7 CCTV system in operation.

A part of the main yard is being concreted to increase impermeable storage capacity of the site.

The depollution process takes place indoors and officers witnessed appropriate infrastructure and storage containers for the liquid waste.

W1A General Management

Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP).

As the site became operational a site specific Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP) need to be submitted to NRW.

Action: Please provide your EMS and FPMP for assessment by Friday the 21st of March 2025. Please ensure both documents are written in line with relevant guidance.

[Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

General management - Waste storage

During the inspection officers noticed that one undepolluted end of life vehicle (ELV) was stored on permeable surface. Please see photo below



Undepolluted ELV battery connected



Undepolluted ELV stored on permeable ground

Permit condition 2.3 Operating techniques states:

2.3.1 The activities shall be operated using the techniques and in the manner described in **Table 2.3** below.

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 hard standing or an impermeable surface with sealed drainage system. **All other wastes shall be stored on an impermeable surface with sealed drainage system**

Mr Lewis stated that this vehicle would be depolluted on the day.

Storing undepolluted vehicles on permeable ground is a breach of the above-mentioned permit condition and subsequently has been assigned a **C3** score.

W4B Reporting – waste returns

Waste returns have been discussed with Mr Lewis.

Last years waste returns have been submitted on time. It was noted that not all waste leaving site had been recorded on the form. Mr Lewis has all the relevant information but was unaware of the need to include some waste streams such as fuel, antifreeze, tyres and batteries on the form. This has been clarified with the officers.

Action: Please revise and re-submit your waste returns for 2024 to waste.returns@cyfoethnaturiolcymru.gov.uk by no later than the 31st of March 2025.

W1A General Management

Technical competence for waste operations

Technically Competent Manager TCM

The site is required to benefit from TCM cover. Mr Lewis relied on the grace period to provide technical competence, which was four weeks from the date operations started.

The period of grace **has now ended**. Should the site remain operational Mr Lewis, must successfully complete his MROC2 course or have external TCM to attend site for the required amount of time every week.

The operations **must not** take place should there be no TCM cover.

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

Kind regards,

Boguslaw Pierzchala Waste regulation Officer (Waste Regulation Team)

Email: boguslaw.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.

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.