

Compliance Assessment Report CAR_NRW0046636

Permit being assessed: AB3596CH.

For: Massey Metals Ltd, **held by:** Massey Metals Ltd

At: River Lane, Saltney, Chester, CH4 8RH.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/03/2025 between 09:45 and 10:25.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Darren Massey, Owner, on 27/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	2.4.1 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.
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 year, a summary of waste quantities and types accepted on to and removed from site during the previous year.

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
W2E	Please ensure that all conditions of the exemption are complied with including the requirement that all waste accepted under the exemption is kept separate and not treated on site.	27/03/2025
W1A	Please place all oily parts in a suitable container	28/03/2025
W4B	The missing annual returns for 2023 and 2024 must be submitted to waste.returns@cyfoethnatriolcymru.gov.uk	11/04/2025

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

This was a routine unannounced site inspection carried out by Natural Resources Officers at Massey metals.

Site manager, Darren Massey, was present during the inspection.

W2E -Waste acceptance -Waste Electric and Electronic Equipment - WEEE

Several Waste Electric and Electronic Equipment (WEEE) were seen on site. Please see the photo below.



WEEE deposited on site.

Mr Massey explained that it had been delivered in the morning and that he is not currently using waste exemptions on site.

The site permit does not include WEEE codes on the list of permitted waste.

Further checks showed that the site still has a valid S2 exemption, which allows for WEEE waste streams to be accepted on site.

Action: Please ensure that **all** conditions of the S2 exemption are complied with, including the requirement that all waste accepted under the exemption is kept **separate** and **not** treated on site.

Please also note that there are a number of changes in legislation with regard to waste exemption being introduced.

Please find the below link which explains the changes:

[Natural Resources Wales / Check before you register](#)

Please note that six months after the legislation comes into force, you will not be able to have a waste exemption and a waste permit for the same site, or directly linked sites next to it.

Should you wish to carry on with the activities covered by the exemption a permit variation would be needed.

General Management - Storage of engines and oily parts

A large number of de-polluted engines and other oily parts were seen on site stored directly on the

ground. Please see photos below.



Engines and oily parts storage

Mr Massey explained that the whole site is concreted and drains into a large interceptor.

It was explained that all engines and oily parts would still require a suitable storage container with weatherproof cover to ensure the minimal amount of rain ingress and subsequent contamination.

Schedule 5 of the ELV Regs 2003 states that sites are "provided with storage facilities that are appropriate for dismantled spare parts, including impermeable storage facilities for spare parts that are contaminated with oil"

Permit condition 2.4 Technical requirements Vehicle depollution and dismantling states:

2.4.1 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.

Directive 2000/53/EC ANNEX I

Minimum technical requirements for treatment in accordance with Article 6(1) and (3) states:

2. Sites for treatment: — impermeable surfaces for appropriate areas with the provision of spillage collection facilities, decanters and cleanser-degreasers,

— appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts

This has been discussed with the site owner on previous occasions and subsequently been scored against the permit condition as a CCS **C3** breach

Action required: Please place all oily parts in a suitable container by **the 28th March 2025**.

W4B Reporting – Waste returns

A review of annual waste return submissions 2023 and 2024 for permit number AB3596CH has been completed.

There are no waste returns on our database for 2023 and 2024.

Officers spoke to of of the employees who stated that the Waste Returns for 2023 had recently been submitted, and also confirmed that 2024 Returns had not submitted.

Condition 4.2.2 of your permit requires you to submit within one month of the end of each year, a summary of waste quantities and types accepted on to and removed from site during the previous year.

Action Required: The missing annual returns for 2023 and 2024 must be submitted to waste.returns@cyfoethnatriolcymru.gov.uk no later than the **11th of April 2025**.

This has been scored against the permit as a CCS **C4** breach

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

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.