

Compliance Assessment Report CAR_NRW0048414

Permit being assessed: GP3095FF.

For: 1st Choice Vehicle Dismantlers, **held by:** Malcolm David Harrison

At: Units 12/13, Tremorfa Ind Estate, Cardiff, Glamorgan, CF24 5SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/04/2025 between 15:04 and 15:44.

Parts of permit assessed: ALL.

NRW Lead Officer: Gareth Morris, accompanied by Daniel Hopkin.

Report sent to: Malcolm Harrison , Owner , on 29/05/2025.

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	Route Cause Breach
W1A - Waste - Management - General management	C3 Minor	Permit Condition 1.1.3
W4A - Waste - Information - Records	C3 Minor	Permit Condition 6.2.2

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

Total non-compliances recorded	Total non-compliance score
3	12

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	EMS must be updated by the operator	30/06/2025
W1A	Complete WAMITAB course and provide evidence that course has been booked.	30/06/2025
W4A	Waste returns must be submitted even if the return is a nil return.	30/06/2025

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

Malcolm David Harrison (First Choice Vehicle Dismantlers) Site Visit, Cardiff
(GP3095FF)-24/04/2025

Waste Regulation Officer Gareth Morris accompanied by apprentice Daniel Hopkin visited Malcolm David Harrison (First Choice Vehicle Dismantlers) Units 12 & 13, Martin Road, Tremorfa Industrial Estate, Rover Way, Cardiff, CF24 5SD to conduct a routine site inspection and to assess compliance with environmental permit; GP3095FF.

The site is a Metal Recycling Site.

On arrival at site, we were met by the site owners. The site owners kindly showed us around the site.

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. The sites environmental management system was produced, but was out of date and needs to be updated.

Action: I informed the permit holder that it was vital that the site permit, environmental

management system and other associated documentation are always available and up to date. 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 1.1.3 states: ***All site staff shall be, or shall work under the direct supervision of a member of staff who is, fully conversant with those aspects of the license conditions and working plan which are relevant to their specific duties.***

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.

W4A-Records

Permit Condition 6.2.2 states: ***A summary of the information, including nil returns, shall be submitted to the Agency, in the format specified by the Agency in Annex 1 which forms part of this condition. Summaries shall be for each financial year and shall be submitted to the Agency within one Month of the end of each financial year.***

Upon checking records, it is apparent that you submitted no waste returns for the financial year 2023-2024. Upon closer inspection, there no record of any submitted waste returns since 2016. You a required by your permit conditions to submit waste returns annually. As the waste returns for financial year 2023-2024 were not submitted, you will therefore receive a Category Three (3) breach for this breach of permit condition.

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

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W2C-Operating Techniques

Permit Condition 4.4.1 states: *All wastes shall be received, inspected, accepted or rejected and recorded in accordance with section 5.6 of the working plan and the standards specified in table 4.4.*

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.

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Photograph 1.1



W2D-The Site

Permit Condition 3.2 states: *Site security shall be provided at all times during the subsistence of this licence, the objective of which shall be to prevent access by humans and livestock which are not authorised either by the licence holder or under legal powers of entry.*

The permitted site benefited from a robust security system made up of 7ft railings and lockable gates. The site also has a 24/7 CCTV system.

W2F – Technical Requirements

Permit Condition 2.1.2 states: *The engineered site containment and drainage systems shall be designed, constructed, inspected, validated and maintained, and shall be fully documented and*

recorded, to be fit for purpose and to meet the standards specified in section 3.2 of the working plan.

During the site inspection, it was evident that all hazardous and non-hazardous waste was being stored and treated on an impermeable surface with sealed drainage system. The impermeable surface was of a very good quality, with no evidence of damage, rutting or pooling of water.

Photograph 1.2



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.