

Compliance Assessment Report CAR_NRW0047873

Permit being assessed: GP3193MV.

For: M & R Commercials Vehicle Dismantling & Recycling Facility, **held by:** T M Wiberg Limited

At: Plots P & W, Nant Y Felin, Swansea, W Glamorgan, SA5 4HG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 01/04/2025 between 11:50 and 13:00.

Parts of permit assessed: See Below.

NRW Lead Officer: Michael Edwards.

Report sent to: Mal Wiberg, Site Operator, on 08/04/2025.

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	C2 Significant	1.1.1 (a)
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	C2 Significant	2.3.1
W2D - Waste - Operations - The site	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.4.1

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

Total non-compliances recorded	Total non-compliance score
3	93

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	Ensure that the operations on site are performed in	31/08/2025

Criteria	Action needed	Complete by
	accordance with a written management system that identifies risks associated with the operation and minimises potential environmental impacts.	
W2C	Ensure that on site operations are completed in accordance with the operating techniques listed in Table 2.3 of the permit.	31/08/2025
W3G	Ensure that waste operations are performed in accordance with the submitted FPMP .	31/08/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Unannounced site inspection undertaken by Michael Edwards of Natural Resources Wales, accompanied on site by permit operator.

W1 - Waste Management - Category 2

Under **condition 1.1.1 (a)** of the permit, you must ensure that operations on site are conducted in line with an Environmental Management System (EMS) that identifies and minimises the pollution risk of on site activities.

The current EMS that the site operates under is '*EMS Environment Permit Site File, dated December 2012*'.

A large volume of waste has been stored on site for a period longer than 12 months, evidenced by images from previous inspections undertaken on site. The permit only allows storage of waste prior to disposal for up to a maximum of 12 months as per **condition 2.1.1 and table 2.1**.

Several oil spills to hardstanding were identified in various locations on the site, including areas of hardstanding which had not been appropriately cleared as required under the permit **condition 2.3.1 and table 2.3**. Furthermore, within the depollution bay, several open drums of waste oils were stored without the necessary bund requirements as per **condition 3.1.3** with an IBC stored on an area of hardstanding containing waste oil. Waste batteries, including damaged units were also stored on the hardstanding area on wooden pallets or directly on the ground in breach of **condition 2.3.1**.



Image 1 - One of several oil spills on hardstanding area identified during the inspection.

A large volume of oil was identified on the impermeable surface used to store engine oils which was yet to be cleared. Although the depollution process was not witnessed during the inspection, it is a requirement under **condition 2.5.1** for the *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.*

Following the inspection, the operator and officer discussed the issues identified on site and reviewed the current management systems and permit requirements which were available in the site office as required under **condition 1.1.3**.

The root cause of the breaches identified above have been attributed to the failure of the on site management system. This has been scored as a **Category 2** breach of **permit condition 1.1.1 (a)** as the current on site management could lead to a significant impact to the environment or local receptors should an incident occur.

Action - as discussed during the inspection, The current EMS is outdated and not reflective of on site activities and must be reviewed to ensure on site activities are undertaken in the manner described under **condition 1.1.1 (a)**.

W2 - Waste Operations

W2A - Permitted Activities

Operations on site are limited to those listed under **condition 2.1.1** and specified in **Table 2.1**.

W2C - Operating Techniques - Category 2

During the previous inspections, officers have noted a significant volume of waste stored at the rear of the building on an area of impermeable surface.



Image 2 - waste stockpile stored at rear of main building identified on 08/11/2023.



Image 3 - waste stockpile stored at rear of main building 01/04/25.

Under the above condition, wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. The storage of these wastes have been raised at inspections on several occasions, with no visible decrease in the quantity of waste being stored on the impermeable surface in this area.

Action - ensure the removal of wastes from the operation to ensure that they are not stored in exceedance of the timeframe allowed under **condition 2.1.1** and **table 2.1**.

Wastes identified on site were in line with **condition 2.2.1** and **table 2.2** of the permit.

Under **condition 2.3.1** the site is required to carry out its activities using the techniques and in the manner described in **table 2.3**.

An IBC that the operator confirmed on site containing oils (approximately 1/3 full) was stored on the area of hardstanding, with no containment measures in place.



Image 4 - IBC containing waste oils stored on an area of hardstanding with no containment

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

Officers identified several batteries stored outside, stored directly on hardstanding or on a wooden pallet on the hardstanding as shown in the image below.



Image 5 - Storage of batteries on wooden pallet on hardstanding.

Under **condition 2.3.1**; Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and, unless stored under weatherproof covering, a lid to

prevent ingress of water

The above non compliances have been categorised as **Category 2 breaches of condition 2.3.1**, as they could lead to a significant impact to groundwater through pollution event or hinder emergency response to an operation incident resulting in significant impact to the environment and receptors in the area.

Condition 2.5.1 set the minimum standard for ELV depollution. During the inspection a significant volume of oils were present under the depolluted engines. The depollution process was not observed during this inspection, however, given the volume of oil identified, please ensure that the minimum technical requirements are met as outlined in the permit.



Image 6 - Oil spill identified on impermeable surface for engine storage.

A follow up inspection will be arranged and you will be asked to demonstrate the depollution process to the officer at that time.

W2D - The Site

All wastes were stored within the permitted boundaries as required under the permit.

W3 - Waste Emissions and Monitoring

W3G - Fires - Category 2

As discussed on site, under **condition 3.4.1** the site must operate in accordance with the approved FPMP - '*M and R Commercials Fire Prevention and Mitigation Plan (FPMP)*', dated February 2019.

During the inspection it was noted current on site practices were not reflective of the methodologies stated in the FPMP. Wastes were not stored in the manner described in the submitted FPMP - section 3.13 and figure 2 (below).

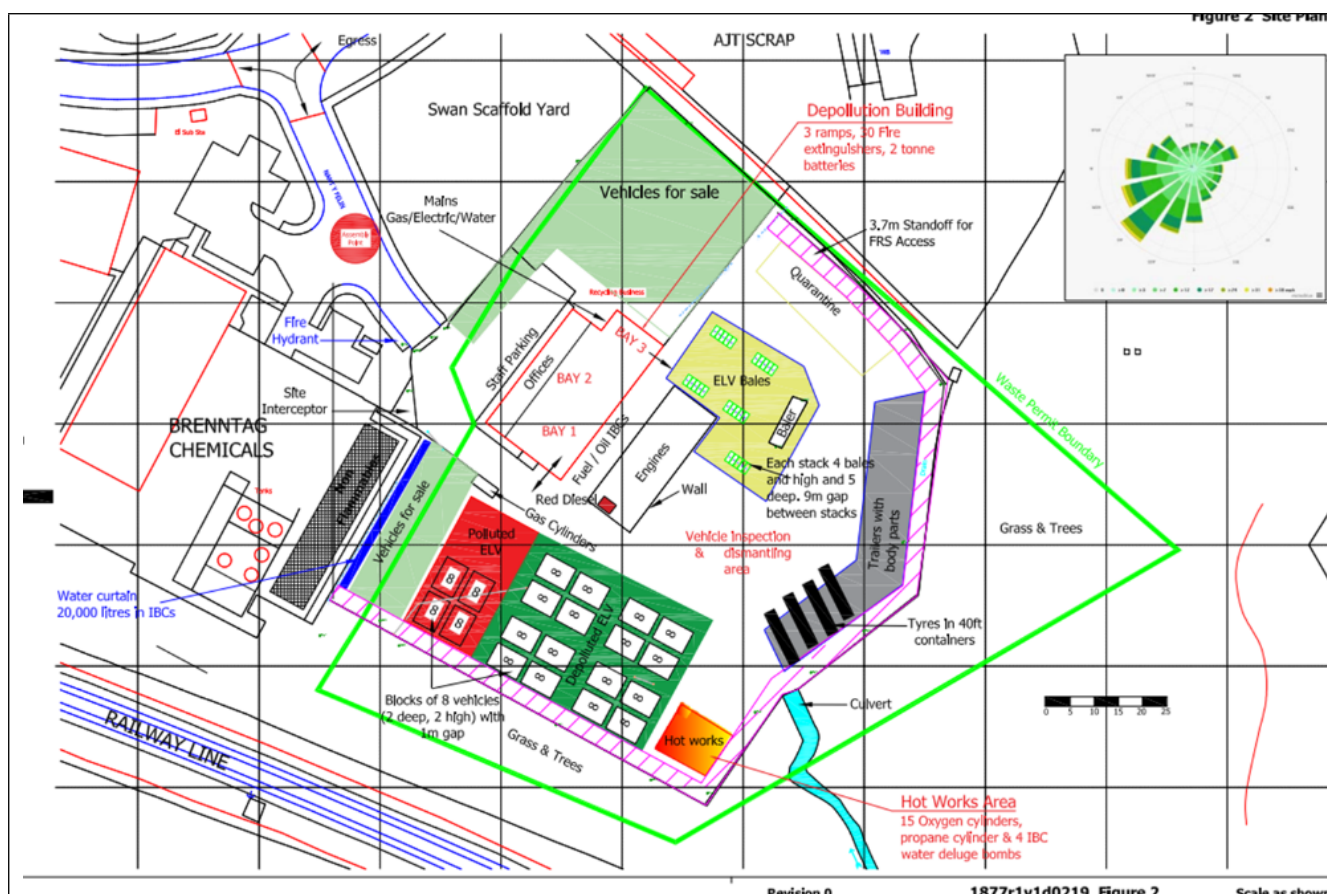


Image 7 - Figure 2 of the site FPMP, detailing storage practices of operation.

During the inspection, 2 large stockpiles of mixed waste were stored in the 'engine' and 'ELV Bales' areas identified above, whilst a large stockpiles of engines were stored in the area identified above as 'polluted ELV' and 'Depolluted ELV'.

At the time of the inspection there was no evidence of hot works being undertaken on site, however the area designated for hot works in figure 2 of the FPMP was being used to store waste tyres prior to removal from site.

The current volume of waste and current storage practices on site, will not allow the FRS to access the site should an incident occur.

This has been scored as a **Category 2 breach** of permit **condition 3.4.1** as failure to store waste in the manner described in the FPMP will impact emergency response to an on site incident which would result in a significant impact to the environment and human receptors due to the current storage methods of waste on site.

Action - As discussed on site current storage practices on site are not in line with the submitted FPMP, the volume and storage of waste on site poses a significant threat to the local receptors and must be reduced to ensure that the operations on site are undertaken in the manner described in the submitted FPMP.

Given the significance of the breaches above, NRW will have to consider its enforcement response. You will be written to separately regarding this decision.

Many thanks for your time during the inspection.

END.

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012.

You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.