

Compliance Assessment Report CAR_NRW0048779

Permit being assessed: EP3295FZ.

For: Pengam Partmart, **held by:** Ian Charles Jenkins

At: Tir-y- Berth, Hengoed, Caerphilly, CF82 8AU.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/07/2025 between 11:35 and 12:15.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Mark O'Gorman.

Report sent to: Ian Jenkins, Director, on 13/08/2025.

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	1.1.1.
W2A - Waste - Operations - Permitted activities	C3 Minor	2.4.1
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4A - Waste - Information - Records	Action only (X)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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 ensure all stockpiles of waste at Pengam Partmart are reduced to under the 4-metre limit to safeguard any potential fire risk.	31/08/2025
W2A	Please ensure all car batteries, whether they are to be resold and / or scrapped are placed in secondary containment measures to prevent any potential of hazardous liquid	31/08/2025
W4A	Please send an up-to-date copy of your WAMITAB certificate following the issue of this CAR form.	08/08/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 CAR FORM HAS BEEN RE-ISSUED AS DUE DATES HAVE BEEN AMENDED ON THE ACTIONS

This report details the site visit made on the 9 July 2025 to Pengam Partmart, permit reference number EPR/EP3295FZ. Natural Resources Wales (NRW) Officers Carla CURTIS and Mark O'GORMAN attended the site at Tir-Yr-Birth, Hengoed, Caerphilly, CF82 8AU for an unannounced, routine site inspection at 11:35 where we met with Mr. Gareth MEREDITH (Site Supervisor). The weather was sunny and warm.

PERMIT COMPLIANCE

CATEGORY 3 BREACH – PERMIT CONDITION 1.1.1

W1A – General Management - "The operator shall manage and operate the activities: 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"

Storing vehicles (or anything else) higher than 4m also goes against the WISH guidance (Waste Industry Safety and Health) for reducing fire risk at waste management sites

which states a max stack height of 4m.

- Unsuitable stacking of processed baled vehicle shells with potential of health, safety and environmental issues (fire risk)
- Poor housekeeping standards in vehicle baler area
- Control measures identified within the EMS / working plan regarding safe stacking of processed baled vehicle shells not sufficient to minimise risk / management of health safety and environmental factors.

Please see report content for further justification.

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CATEGORY 3 BREACH - PERMIT CONDITION 2.4.1

W2A – Permitted Activities - "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

- Car batteries not stored in appropriate available containers to capture potential loss of containment of battery acids.
- Issue has been raised previously with operator.

Please see report content for further justification

GENERAL OBSERVATIONS –

Pengam Partmart operate under a Tier 3 bespoke environmental permit for an End-of-Life Vehicle (ELV) depollution and dismantling facility based on standard rule set SR2010_No12. This site consists of treatment operations that are limited to manual and/or mechanical sorting, separation, depollution, dismantling and compaction of waste vehicles and components. The site was in operation at the time of the visit with depolluting activities taking place. No waste of any type was stored outside of the permit boundary. There were numerous stockpiles of disused vehicles stored on site outside in the open. Site security was not an issue due to fencing located all around the property.

The general housekeeping on the site was good with no large amounts of loose debris located on the floor with cars stored securely across site. It was also noted that the concrete impermeable flooring was generally in good condition with no visible defects noted. There were no offensive odours and / or excessive noise witnessed by NRW Officers during the site inspection. The site has an interceptor drainage system which is regularly maintained / emptied. The outside storage yard possessed a large quantity of depolluted vehicles which were of no concern to NRW Officers as they were adequately spaced apart (see photo 1 and photo 2). There was no evidence of any loss of containment / visible leaks and the cars were to be either scrapped on site or auctioned.



Photo 1 - depolluted vehicles



Photo 2 - depolluted vehicles

END OF LIFE VEHICLE (ELV) WASTE - DEPOLLUTION & STORAGE

During the site inspection, NRW Officers noted that the stockpile of processed vehicle baled shells located in the outside yard were stacked above four metres (see photos 3 and 4). It would be advised for a review of the sites EMS / working plan regarding safe storage of vehicle shells will need to be undertaken to incorporate health, safety and environmental factors of operating the site to prevent /

mitigate and fire risk.

The FPMP (Fire Prevention and Mitigation Plan) guidance represents the minimum appropriate measures required to be put in place by operators to ensure that fires are prevented. The FPMP guidance sets the maximum storage height of stockpiled waste to four metres. This height specification was determined by the FRS (Fire and Rescue Service) for general management practise and stability, to enable the FRS to tackle a fire on site if an incident were to occur.

ACTION: Please ensure all stockpiles of waste at Pengam Partmart are reduced to under the 4-metre limit to safeguard any potential fire risk.



Photo 3 - Storage of scrap, baled metal exceeding 4 metres.



Photo 4 – As above

Whilst within the depollution bay, a large quantity of car batteries (some reuse and some scrap) were located not within the dedicated secondary storage containers and also in close proximity to where the depollution activities were taking place where there could be a potential fire risk (see photos 5 and 6). Please ensure all car batteries, whether they are to be resold and / or scrapped are placed in secondary containment measures to prevent any potential of hazardous liquid(s) such as battery acid leaking. See extract below from article 6(1) of the End-of-Life Vehicles Directive regarding storage of car batteries which compliance is a requirement under section 2.4.1 (Vehicle depollution and dismantling) of the sites environmental permit.

ANNEX I

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

1. Sites for storage (including temporary storage) of end-of-life vehicles prior to their treatment:
 - impermeable surfaces for appropriate areas with the provision of spillage collection facilities, decanters and cleanser-degreasers,
 - equipment for the treatment of water, including rainwater, in compliance with health and environmental regulations.
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,
 - appropriate containers for storage of batteries (with electrolyte neutralisation on site or elsewhere), filters and PCB/PCT-containing condensers,
 - appropriate storage tanks for the segregated storage of end-of-life vehicle fluids: fuel, motor oil, gearbox oil, transmission oil, hydraulic oil, cooling liquids, antifreeze, brake fluids, battery acids, air-conditioning system fluids and any other fluid contained in the end-of-life vehicle,
 - equipment for the treatment of water, including rainwater, in compliance with health and environmental regulations,
 - appropriate storage for used tyres, including the prevention of fire hazards and excessive stockpiling.

Extract 1 - Excerpt from article 6(1) of the End-of-Life Vehicles Directive with details of car battery storage identified in red box.

ACTION: Please ensure all car batteries, whether they are to be resold and / or scrapped are placed in secondary containment measures to prevent any potential of hazardous liquid



Photo 5 - Large volume of car batteries stored.



Photo 6 - Large volume of car batteries stored.



Photo 7 – As above

The depollution bay was in good working order with all vehicle fluids stored within the appropriate storage containers ready for safe disposal. On average 10-15 vehicles a day are depolluted via this process. There were no concerns regarding the storage of ELV liquids with no loss of containment or excess ELV liquids present or witnessed.

WAMITAB The site TCM (Technically Competent Manager) is Mr. JENKINS

ACTION: Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form.

WASTE RETURN DOCUMENTS Pengam Partmart have submitted their annual waste return for 2024 with a total of 3,720 tonnes of waste received and a total of 3,684 tonnes of waste removed, the maximum total quantity of waste accepted at the site per year shall not exceed 6,000 tonnes.

If you have any issues with this report, please contact Carla Curtis on carla.curtis@naturalresourceswales.gov.uk Thank you.

In this document 'Natural Resources Wales' means the Natural Resource 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.