

Compliance Assessment Report CAR_NRW0049358

Permit being assessed: ZB3297TP.

For: Plot 12a, **held by:** Steven Thomas

At: Waterston, Milford Haven, Pembrokeshire, SA73 1DP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/09/2025 between 13:00 and 13:45.

Parts of permit assessed: General management, and operating techniques.

NRW Lead Officer: David Ellar, accompanied by Hugh Martin.

Report sent to: Stephen Thomas, Permit Holder, on 11/09/2025.

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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
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
0	0

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?

No action required.

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

An unannounced, routine site inspection was undertaken on Friday 05 September 2025 at TBS Plot 12a Waterstone Ind Est. Present at the time of the site inspection were David Ellar and Hugh Martin (NRW) and Stephen Thomas (Permit Holder), David MacKay (TCM) and the Office Manager (TBS) who also accompanied officers around the site. The site operates under a Standard Rules Permit SR2012 No14 - Metal recycling, vehicle storage, depollution & dismantling (authorised treatment) facility.

The weather was fine but it had recently been very wet. The purpose of the inspection was to assess compliance against conditions of the Environmental Permit (Ref: EPR/ZB3297TP).

Permit Breaches:

No permit breaches were identified during this inspection.

Previous inspection:

One category 3 noncompliance was recorded during our last inspection under W2A – Permitted Activities – Permit condition 3.1.3 (see Compliance Assessment Report CAR_NRW0046653 for full detail). During the inspection a yellow open topped container full of oil was observed in the waste fluid storage area (trailer) in contravention of this permit condition. There was a bunded oil storage tank in the area and this must be used for storage of waste oil. An action was set to store ELV wastes as per permit conditions.

This action had been completed, the container had now been removed and all ELV liquid wastes were stored as per permit conditions.

General Observations:

The site was quiet and it had been a while since any ELV's had been depolluted. The depollution shed is now mainly used for maintenance and repair. Scrap metal was stored on the impermeable surface outside of the shed. No sorting or processing of the waste was observed during the inspection. Whilst the waste was on the impermeable surface vehicle movements on site were pushing it to the rear edge. There is little definition between the edge of the treatment pad and the adjoining hardstanding as containers, tyres, and general non wastes are stored right up to it. Should and spillages occur on the pad there is a risk that a quick clean up could be compromised and pollutants could escape on to the unmade ground. The operator could consider a clean up around the edge of the pad to ensure waste materials are fully on it and the perimeter is maintained and checked in the site weekly check logs.

The small WEEE which was previously stored in the shed under a waste exemption had now all been removed. The operator informed officers TBS did not intend to receive any more small WEEE due to the fire risk associated with it.

Storage of waste:

Batteries were seen to be stored indoors in battery boxes and fluids were in the bunded liquid ELV waste storage area. This liquid waste storage area could be improved with signage and protection such as bollard or cone etc..

Waste Returns:

Waste returns were checked and were up to date with Q1 and Q2 2025 being submitted.

TCM:

James Mackay (David) is current TCM for the site, WAMITAB CC is in place until 21/02/2026

Thank you for your time during the inspection.

Ends.

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.