

Compliance Assessment Report CAR_NRW0049481

Permit being assessed: YP3194FU.

For: Flintshire Commercial Dismantlers, **held by:** Sarah McGilloway

At: Station Road, Greenfield, Holywell, Flintshire, CH8 7EP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/09/2025 between 11:40 and 12:00.

Parts of permit assessed: 1.1.1, waste acceptance, waste returns, TCM, EMS and FPMP.

NRW Lead Officer: Boguslaw Pierzchala.

Report sent to: Sarah McGilloway, Owner, on 10/10/2025.

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	Section 2.4.1 of the site permit states: 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. 2. Sites for treatment: (...)appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts. 6 (1)2 (sites for treatment) - appropriate containers for storage of batteries (with electrolyte neutralisation on site or elsewhere),

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		filters and PCB/PCT-containing condensers
W2E - Waste - Operations - Waste acceptance	C3 Minor	Condition 2.3.2 states Waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table(s) S2.1 [, S2.2 etc.] Table S2.1 Permitted waste types and quantities for vehicle depollution and dismantling (authorised treatment) facility
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	Section 2.5.1 of the permit describes improvement plans specified in table S1.3 stating that the site shall submit an Environment Management System (EMS) & FPMP to Natural Resources Wales for approval within 3 months of the permit being issued; that is by 01/02/2018
W1A - Waste - Management - General management	C2 Significant	Section 1 Management 1.1 General management states: 1.1.1 The operator shall manage and operate the activities: (b) using sufficient competent persons and resources. 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained. 1.1.4 The operator shall comply with the requirements of an approved competence scheme
W4B - Waste - Information - Reporting	C4 No impact	Condition 4.2.2 of your

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		permit requires you to submit within one month of the end of each calendar year a summary of waste quantities and types accepted on to and removed from site for that year

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

Total non-compliances recorded	Total non-compliance score
5	43.1

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
W1A	Please ensure all oily parts are stored in appropriate containers with weatherproof cover. For immediate compliance. Please ensure all batteries are stored in an appropriate container. Please comply by the 17th of October 2025	17/10/2025
W2E	Please place all pressurised gas containers in a lockable cage prior to removal from site. Please provide photographic evidence of the cage in situ by the 31st of October 2025.	31/10/2025
W1A	Please ensure all vehicles are fully depolluted prior to storage on the main yard. For immediate compliance	10/10/2025
W1A	Further work was required and an action was requested to submit the document for re-assessment by the 25th of April 2025. This action was not completed until Tuesday the 7th of October 2025 after the officer requested the documents following the inspection	10/10/2025
W1A	Please ensure appropriate TCM cover is available on site. For immediate compliance	10/10/2025
W4B	The missing annual waste returns for both 2023 and 2024 must be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk no later than the 31st October 2025.	31/10/2025

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

20/09/2023

On Friday the 26th of September 2025 NRW officer attended the site to carry out an unannounced, routine inspection. The site owner, Sarah McGilloway, was not present, and the officer was let in by a member of staff to inspect the site.

The officer phoned the owner twice, during and after the inspection, to discuss the findings.

The yard was quiet with no other employees present and no vehicles being delivered or worked on.

(W1A) General management

Containment and storage of waste

The front yard appeared reasonably tidy and well-maintained. Some of engines were stored indoors on impermeable surface.

Several engines and oily parts were seen stored on outdoor shelves which were visibly corroded and had several holes at the front.

Through the archway, the officer saw some engines stored on permeable ground. See photos below



Metal storage box in the main yard



Engines stored in the main yard



Engines stored in the open on permeable ground

Ms McGilloway explained that collection had been booked for the engines; however, a few had been left in the yard due to space shortage.

This issue had been discussed with Ms McGilloway during previous inspections and following the

inspection on the 26th of September. The owner stated this would be addressed immediately.

Section 2.4.1 of the site permit states:

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.

2. Sites for treatment: (...) appropriate storage for dismantled spare parts, including impermeable storage for oil-contaminated spare parts.

Action: Please ensure all oily parts are stored in appropriate containers with weatherproof cover.
For immediate compliance.

This will be scored as a **C3** breach against the above-mentioned permit condition.

Waste batteries

Waste batteries are being kept indoors, in the depollution area. On closer inspection it transpired that the bottom of the storage box was broken in half.



Batteries storage box



Broken bottom the batteries storage box

Section 2.4.1 of the permit states:

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.

6(1) 2 (sites for treatment) - appropriate containers for storage of batteries (with electrolyte neutralisation on site or elsewhere), filters and PCB/PCT-containing condensers

This will be scored as a **consolidated C3** breach against the above-mentioned permit condition

Action: Please ensure all batteries are stored in an appropriate, Acid resistant container. Please comply by the 17th of October 2025.

W2E - Waste acceptance

Fire extinguishers on site

The officer noted fire extinguishers stored on the ground. Please see the photos below.



Fire extinguisher on ground next to a fire engine stored on a tyre



Fire extinguisher on the ground

Pressurised gas containers are not listed on the site permit. They also pose a fire risk.

This issue was raised during the last site inspection with an action given to obtain a lockable cage for pressurised gas containers by **31st of January 2025**. This action has not been completed.

Condition 2.3.2 states Waste shall only be accepted if: (a) it is of a type and quantity listed in schedule 2 table(s) S2.1 [, S2.2 etc.]

Table S2.1 Permitted waste types and quantities for vehicle depollution and dismantling (authorised treatment) facility

A Category 3 non-compliance score has been given for this permit breach under W2E - Waste acceptance

This breach was raised with the site owner who stated that they do not accept this waste stream; however they often find the extinguishers left in the ELVs accepted on site.

Action: Please ensure your acceptance procedures are revised to ensure non-conforming waste is rejected and safely handled.

Please place all pressurised gas containers in a lockable cage prior to removal from site. Please provide photographic evidence of the cage in situ by the **31st of October 2025**.

(W1A) General management

End-of-life vehicles were stacked up 2 or 3 high in the main yard. Several vehicles were checked. One contained small amount of liquid in one of the containers.



ELV with fluid left inside stored in permeable ground

Action: Please ensure all vehicles are fully depolluted prior to storage on the main yard. For immediate compliance

(W1A) General management

The Environmental Management System (EMS) for the site is dated 10/10/2004.

Section 2.5.1 of the permit describes improvement plans specified in table S1.3 stating that the site shall submit an Environment Management System (EMS) & FPMP to Natural Resources Wales for approval within 3 months of the permit being issued; The variation of the permit was issued in November 2017.

Updated version of EMS and FPMP had been submitted to NRW for assessment.

Further work was required and an action was requested to submit the document for re-assessment by

the **25th of April 2025**.

This action was not completed until Tuesday the **7th of October 2025**.

The score for breaching the above conditions has been **consolidated** into a **C3** permit breach.

Details of the assessment will be sent separately

Technically Competent Manager - TCM

Site attendance guide for technically competent manager states:

“The technically competent manager must be in a position to direct activities on the site. This will be reflected in the operator’s management system and operational procedures. There is a minimum site attendance of one hour a week on all operational sites. This includes in-house facilities taking their own waste. A week runs from Sunday at midnight and ends on the following Sunday at midnight”

WAMITAB qualification and TCM coverage

At the moment the site benefits from external TCM cover which might change once Ms McGilloway obtains relevant qualification.

The TCM’s attendance (arrival and departure times) needs to be recorded in the site’s diary. The records must be available for us to inspect.

The above requirement has been discussed with the site owner on previous occasions.

It transpired that the external TCM visits the site every two weeks rather than weekly. The records have not been kept in the office diary for NRW to inspect.

It was raised with the site owner again and stressed that it is a concern that the site has been operating without sufficient supervision. This breach along with several breaches in relation to waste acceptance and storage increases the risk of pollution.

The EMS and FPFM have not been submitted within the required time frame and are still in the process of being assessed.

The owner stated that this issue will be addressed immediately. A TCM will be requested to attend site on a weekly basis.

Section 1 Management 1.1 General management states:

1.1.1 The operator shall manage and operate the activities:

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.4 The operator shall comply with the requirements of an approved competence scheme

**A Category 2 non-compliance score has been given for this permit breach under (W1A)
General management**

Should the site not meet the minimum TCM attendance requirement an appropriate enforcement action will be considered.

Action: Please ensure appropriate TCM cover is available on site. For immediate compliance

Waste returns

Waste Return Review of the waste returns submissions for permit EPR-YP3194FU has been completed.

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

Natural Resources Wales have not received any waste returns for the years 2023 and 2024.

This issue was raised during previous site inspection as Waste Returns had not been submitted for 2023.

Action Required

The missing annual waste returns for both 2023 and 2024 must be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk no later than the 31st October 2025.

A Category 4 non-compliance score has been given for this permit breach under

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

Kind regards

Boguslawa Pierzchala

Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.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.