

Compliance Assessment Report CAR_NRW0049914

Permit being assessed: WP3395FT.

For: Twyn Dismantlers Ltd, **held by:** Caleb Griffiths

At: Fleur-de-leys, Blackwood, Caerphilly, NP12 3UL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/11/2025 between 10:45 and 12:15.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Mark ogorman.

Report sent to: Ashley Griffiths , Technically Competent Manager , on 04/12/2025.

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	1.2.2.
W2A - Waste - Operations - Permitted activities	C3 Minor	3.1.2
W2D - Waste - Operations - The site	Action only (X)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	5.1.4
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	C4 No impact	6.1.2

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

Total non-compliances recorded	Total non-compliance score
4	12.1

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	You are required to update and improve your current EMS. It is vital that your EMS reflects the activities being undertaken on site and how they are carried out to minimise any risks.	30/06/2026
W2A	Please undertake repairs of the areas of hardstanding upon which depolluted vehicles are stored. Please also undertake immediate repairs of the raised pavement separating the impermeable surface from hardstanding to ensure that this area is sealed such that no liquids can bypass it and run on to the hardstanding.	31/03/2026
W2D	Ensure all black bin bags are removed as shown in photos 11 & 12 and send photos to show this has been actioned.	31/01/2026
W3B	Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages.	31/01/2026
W4A	Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form so we can save this on file.	31/01/2026
W4B	Submit outstanding waste returns for the last two years.	31/01/2026

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 Compliance Assessment Report (CAR) has been completed following a site inspection undertaken on Friday 4 November 2025 at Twyn Car Dismantlers Ltd, Fleur De-Lys. Environmental Permit number EPR – WP3395FT.

Present:

Ashley Griffiths – Technically Competent Manager

Carla Curtis– Waste Regulation Officer, Natural Resources Wales

Mark O Gorman – Waste Regulation Officer, Natural Resources Wales

This was a routine, un-announced site inspection. The weather at the time of the visit was wet with heavy rain. The inspection was filmed by NRW officer Mark O’gorman, using an NRW issued body worn camera, following no objections from the site manager.

Background

The permit for the site is currently held by Mr. Caleb Griffiths, although the main running of the site and associated paperwork is undertaken by the Technically Competent Manager, Ashley Griffiths.

ELV OPERATIONS

The site are allowed to store a maximum of 100 fully depolluted end of life vehicles (ELV’s) containing neither liquids nor hazardous components, on hardstanding and a maximum of 100 ELV’s on impermeable pavement with sealed drainage, as detailed in Table 2.1 of the permit, shown below;

Table 2.1 Specified end-of-life vehicle storage and treatment operations

Specified Operation	Permitted Waste Types (and European Waste Catalogue number) which may be subject to the Specified Operation	Limits on Specified Operations
STORAGE		
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).	i) 16 01 04 End of life vehicles **	<ul style="list-style-type: none"> • Maximum storage capacity 100 vehicles stored on an Impermeable Pavement with a sealed drainage system.
D15: Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	ii) 16 01 06 End of life vehicles (containing neither liquids nor other hazardous components) iii) Residual wastes produced as a result of depollution or further treatment.	<ul style="list-style-type: none"> • Maximum storage capacity 1000 vehicles. • Maximum storage capacity 50 tonnes, not exceeding 10 tonnes of hazardous waste. • Maximum storage time of 1 year prior to disposal or 3 years prior to recovery.
		<p>The overall maximum storage capacity shall not exceed 1000 vehicles and 50 tonnes of residual waste, not exceeding 10 tonnes of hazardous waste removed from depolluted vehicles.</p>

During the inspection it was noted that, whilst the storage of such vehicles appeared disorganised, they were being stored in accordance with permit conditions.

The boundary of the site lies next to the river Rhydney and it was noted that a

soil/stone bund had been constructed around the vulnerable areas of the site in order to minimise the risk of any residual wastes entering the watercourse. All depollution of vehicles is undertaken inside a building.

Housekeeping was observed to be poor, but all fluid types removed as part of the depollution process were being stored adequately in separate containers in bunded storage areas.

Site Infrastructure

Areas of hardstanding at the top of the site on which depolluted vehicles were being stored was found to be in very poor condition. There were multiple areas of significant pooling of water and concerns over the integrity, adequacy and suitability of it in its current state. In addition to this, the lower half of the site benefits from impermeable surface with a raised pavement separating it from a further area of hardstanding. This pavement should be designed to ensure that no liquids can bypass the raised sill and run onto the hardstanding. At the time of the inspection the raised pavement was badly damaged.

This has been highlighted during previous inspections, and although repairs have been attempted it is unlikely to be a suitable long-term solution. It is now vital that you consider the effectiveness of the sites current layout in conjunction with a documented environmental management system that identifies and minimises the risk of damage to areas of engineered containment. Failure to consider this will result in further deterioration of the raised pavement and could pose a threat to land and groundwater contamination as potentially hazardous liquids penetrate and bypass the current concrete sill and run onto the hardstanding.

Condition 3.1.2 of your environmental permit states;

- 3.1.2 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 meet the standards specified in Table 3.1 below.**

Table 3.1 Site containment & drainage standards

Type of Site Surface & Drainage	Minimum Specified Standards of Design, Construction & Maintenance
a) Hardstanding.	<p>Areas of hardstanding shall be constructed of granular material (e.g. crushed stone, aggregate, road planings or other similar material) and maintained such that the working surface:</p> <ul style="list-style-type: none"> i) shall remain even; ii) shall not be subject to settlement or differential settlement; iii) shall not be subject to rutting by vehicles even when wet; iv) shall have sufficient durability to allow cleaning for example by scraping; v) shall remain free of standing water.



Photos 1 & 2 showing the raised pavement damaged

The above breach of Condition 3.1.2 has been scored a Category 3 breach under W2A – Permitted activities.

Action – Please undertake repairs of the areas of hardstanding upon which depolluted vehicles are stored. It is important to ensure that areas of hardstanding are constructed and maintained so that water does not pool and compromise the integrity of the surface.

Please also undertake immediate repairs of the raised pavement separating the impermeable surface from hardstanding to ensure that this area is sealed such that no liquids can bypass it and run on to the hardstanding. **Deadline for repairs to be carried out 31 March 2026**

In addition to this, at the time of the inspection, the drip tray underneath the crusher had overspilled onto an area with no sealed drainage. With the river Rhyrne approximately 13 metres away from this particular area of the site, this could lead to significant soil and groundwater emissions, This has also been highlighted during previous inspections.

Condition 5.1.4 of your permit states;

“In the event of any potentially polluting leak or spillage occurring on site, documented control and remediation procedures shall be implemented immediately and recorded, and shall meet the standards specified in Table 5.1 below.”

Table 5.1 Standards for prevention & control of leaks and spillages

Action	Specified standards
a) Loading and unloading skips, drums and other containers	i) Loading and unloading of skips, drums and other containers shall be supervised at all times by a member of staff. ii) Lids/ caps/ bungs or other closures shall be in place during loading/ unloading. iii) Loading/ unloading shall be carried out in an area provided with engineered containment of the type required for that waste and of the standard of containment specified under condition 3.1
b) Filling and emptying, tanks, drums and other containers	i) Filling and emptying of tanks, drums and other containers shall be supervised at all times by a member of staff. ii) Lids/ caps/ bungs or other closures shall be in place at the end of filling iii) Containers, tanks and drums shall not be filled beyond their operational capacity. iv) Filling and emptying shall be carried out in a bunded area maintained in accordance with condition 3.1 v) Measurement of level/ void space shall be by physical dipping prior to loading.
c) Inspection, maintenance and repair of skips, tanks, drums and other containers	i) Skips, tanks, drums and other containers shall be inspected daily for leaks. ii) Any fixed tanks found to be leaking shall have their contents immediately transferred to an alternative appropriate tank or container. iii) Any skips, drums and/or other containers found to be leaking either shall be immediately transferred to a larger appropriate over-container or shall have their contents immediately transferred to an alternative appropriate tank or container.
d) Control and remediation of leaks and spillages	i) Minor spillages of oil, fuel or other end of life vehicle fluid shall be cleaned up immediately, using sand or proprietary absorbent to clean up liquids and placed in alternative containers. ii) Major spillages of oil, fuel or other end of life vehicle fluid which are causing or are likely to cause polluting emissions to the environment: <ul style="list-style-type: none"> • Immediate action shall taken to contain the spillage and prevent liquid from entering surface water drains, water courses and unsurfaced ground; • the spillage shall be cleared immediately and placed in alternative appropriate containers; • the Agency shall be informed immediately.



Photos 3 & 4 showing drip tray underneath the crusher

The above breach of Condition 5.1.4 has been scored a Category 3 breach under W3B – Emissions of substances not controlled by emission limits.

Action – Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. You must follow pollution prevention measures to ensure no emissions to land and groundwater. **Deadline by 31 January 2026.**

Drainage

Whilst on site, officers viewed the inspection chamber of the interceptor and noted the level of liquid was quite high. Officers were informed that the interceptor had recently been emptied and cleaned, paperwork showed this had took place in September. 2025 With the levels observed in the chamber already almost at maximum, we would strongly recommend that the interceptor is emptied and serviced regularly.



Photos 5 & 6 showing inspection chambers of the interceptor

Action – Please arrange for the interceptor on site to be emptied and cleaned as soon as possible and copies of paperwork forwarded to Natural Resources Wales. Please also ensure that a suitable timetable for maintenance is implemented to prevent such situations from arising in the future.

-

Management System and Operating Procedures

Whilst it is evident that your current permit is very outdated, it is clear that the absence of a fully functional Environment Management System (EMS) is contributing to many of the failures on site. It is vital that your EMS reflects the activities being undertaken on site and how they are carried out to minimise any risks. All risks need to be identified and processes put into place and documented as to how these risks are managed in order to prevent harm to the environment or human health and to ensure full compliance with permit conditions and any directly applicable legislation.

Condition 1.2.2 of your permit states;

“Storage and treatment operations of waste motor vehicles shall meet the requirements of Schedule 5 of the ELV Regulations. Infrastructure and equipment provided to meet these obligations shall be maintained in working order and shall be used to give effect to their purpose.”

Furthermore, all waste permits granted before 6 th April 2008 are required to have an Environmental Management System as per Part 3 (1) of [The Environmental Protection \(Miscellaneous Amendments\) \(England and Wales\) Regulations 2018](#)

The above breach of Condition 1.2.2 has been scored a Category 3 breach under W1A – General Management. (The breach is not an offence; however, we have the power to serve an enforcement notice for this breach. Failure to comply with the notice is an offence.)

Action – You are required to update and improve your current EMS with a plan outlining how you will address the issues highlighted in this Compliance Assessment Report in order to prevent future occurrences and ensure future compliance with your environmental permit. **Deadline by 30 June 2026.**

-

Technical Competency

The site TCM (Technically Competent Manager) is Ashley Griffiths.

ACTION – Please send an up-to-date copy of your WAMITAB certificate to NRW officer following the issue of this CAR form so we can save this on file. **Deadline by 31 January 2026.**

-

Waste Returns

Waste Returns have not been received for the last few years.

Permit condition 6.1.2 requires the operator to submit an annual summary record of the waste types and quantities accepted and removed from the site within one month of the end of each financial year.

Summary records of wastes accepted and removed

- 6.1.2 A summary record of the waste types and quantities accepted and removed from the site shall be made annually at the end of each financial year and shall be submitted to the Agency within one month of the end of that year. The summary record shall be in the format detailed in Appendix A or otherwise subsequently specified by the Agency in writing.

This information should be submitted to NRW by means of an annual waste return. We do not have any records of waste returns submitted since 2013. Full guidance on waste returns can be found on our website.

The above breach of Condition 6.1.2 has been scored a Category 4 breach under W4B – Reporting

ACTION – Submit outstanding waste returns for the last two years.

Deadline by 31 January 2026.

General

As has been noted during previous inspections, the site still remains extremely cluttered. Areas benefiting from sealed drainage are covered with various residual wastes. Due to poor organisation housekeeping on site these areas are not being used to their full potential. Major improvements to site infrastructure are required to ensure

that the permit can be fully complied with.

During the inspection NRW officers observed a large number of vehicles being stored outside the boundary of the permit. Whilst it was explained that they were not kept there overnight, and were instead brought onto site, NRW would strongly recommend that this arrangement be reviewed. Access to the site for emergency services in the event of a fire would be severely compromised should the current provisions continue.



Photos 7&8 showing cars outside the boundary

It was noted that significant quantities of tyres were being stored see photo 8 & 10, Ashley (TCM) stated that he has arranged to have the tyres collected the following week.



Photos 9 & 10 showing pile of tyres due to be removed

Action Reduce the stockpile volume of tyres and forward copy of the waste transfer note.

Since the inspection, progress has been made here, and tyres have been collected, please ensure that you are having the tyres collected regularly.

As officer were leaving site they noticed piles of black bags filled with what appeared to be residual waste see photos 11 & 12



Photo 11 & 12 showing black bags filled with waste

Action Ensure all this waste is removed and send photos to show this has been actioned. **Deadline by 31 January 2026.**

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.