

Compliance Assessment Report CAR_NRW0050214

Permit being assessed: EB3038RW.

For: Lelo Metal Recycling Ltd, **held by:** Lelo Metal Recycling Ltd

At: Craig Lelo Works, Gwyddelwern, Corwen, Denbighshire, LL21 9SD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/12/2025 between 12:00 and 12:20.

Parts of permit assessed: 1.1.1, 2.4 .

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Steven White.

Report sent to: Gari Jones, Owner, on 23/01/2026.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W1A - Waste - Management - General management	C3 Minor	Section 2.4.2 and 2.4.1
W1A - Waste - Management - General management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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	Action: Please ensure the batteries are stored in appropriate containers with weatherproof cover at all times. For immediate compliance Action required: Please place all oily parts in a suitable container by the 31st January 2026	23/01/2026

Criteria	Action needed	Complete by
W1A	Please provide your WAMITAB certificate for our records.	30/01/2026

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.

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

On Friday the 19th of December 2025 Natural Resources Wales (NRW) waste regulation officers attended at Lelo Metal Recycling Ltd.

This was a planned, unannounced site inspection.

The weather wet and windy but it had been raining prior to officers visiting the site.

The officers met Alan Jones, site owner, who accompanied officer throughout the inspection.

The site was being improved by concreting the storage areas.

(W3D) Noise and vibration – The site was operational at the time of inspection. The noise deemed to be at acceptable levels.

W1 General management

Depollution area

The depollution area is located in a separate building. It was non-operational at the time, with the shutters closed and ELVs awaiting depollution stacked near to the building.

W1 General management - storage

Officers witnessed ongoing improvement works.

The indoor storage area was fairly well organised with several waste streams stored in separate containers.

Outdoor storage areas.

Due to the ongoing improvements the waste was being stored in high piles in the main area and cluttered in the smaller area by the main building.

It was raised with Mr Jones that planning for improvement works need to take into consideration storage of waste already on site and any incoming deposits.

Please ensure that the waste is stored appropriately, also in the event of works being carried out.

Batteries

It was noted that a number of boxes containing batteries were stored outside with no cover, clearly wet after heavy rain. Some of the boxes were damaged .Please see photos below.

This issue has been raised with the management on previous occasions.

Section 2.4.2 of the site permit states: “Treatment of waste batteries and accumulators must meet the minimum requirements set out in Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC”

Annex III, PART A: TREATMENT,(...)2. States: Treatment and any *storage, including temporary storage*, at treatment facilities shall take place in sites *with impermeable surfaces and suitable weatherproof covering or in suitable containers.*



Batteries stored outside in boxes with no weatherproof cover

This has been discussed with the site owner on previous occasions and subsequently been scored against the permit condition as a CCS C3 breach

Action: Please ensure the batteries are stored in appropriate containers with weatherproof cover at all times. For immediate compliance

Storage of oily parts.

During the inspection officers saw that oil-contaminated part were stored in an open top skip with no weatherproof cover and also on the ground with oil sheen visible on the run off water. Please see photos below

Permit condition 2.4 Technical requirements Vehicle depollution and dismantling states:

2.4.1 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.

Directive 2000/53/EC ANNEX I

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

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

Schedule 5 of the ELV Regs 2003 states that sites are "provided with storage facilities that are appropriate for dismantled spare parts, including impermeable storage facilities for spare parts that are contaminated with oil"

This breach has been assigned a **consolidated CCS3 score**.

Action required: Please place all oily parts in a suitable container by **the 31st January 2026**



Oily parts stored directly on the ground



Oil seen in the run-off water



Oils parts stored in an open top skip

W1 General management

Technically Competent Manager - TCM

Action: Gari Jones, site owner, has recently completed his WAMITAB. Please submit your certificate by no later than Friday the **30th January 2026**.

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

Kind regards,

Boguslawa

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.