

## Compliance Assessment Report CAR\_NRW0050844

**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:** 04/02/2026 between 11:00 and 12:00.

**Parts of permit assessed:** Various.

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

**Report sent to:** Ashley Griffiths, Site Manager (TCM), on 03/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
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

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
W2D	Ensure all black bin bags are removed as shown in photo 9 and send photos to show this has been actioned	31/03/2026
W3B	Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. (Tray /area under the Baler)	31/03/2026

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 February 2026 at Twyn Car Dismantlers Ltd, Fleur De-Lys. Environmental Permit number EPR – WP3395FT.

Present:

Ashley GRIFFITHS – Technically Competent Manager (TCM)

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 dry, cold and sunny. The inspection was filmed by NRW officer Mark O’GORMAN, using an NRW issued body worn camera, following no objections from the site manager.

#### **List of Actions/Breaches from last site inspection 4 November 2025**

<u>Criteria</u>	<u>Action needed</u>	<u>Assessment result</u>	<u>Complete by</u>
W1A	<u>You are required to update and improve your current Environment Management System (EMS). It is vital that your EMS reflects the activities being undertaken on site and how they are carried out to minimise any risks.</u>	C3 Minor	30/06/26
W2A	<u>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.</u>	C3 Minor	31/03/26 <b>partially completed</b>

W2D	Ensure all black bin bag are removed as shown in photos 11 and 12 and send photos to show this has been actioned,	Action Only	31/01/26 <u>not completed</u>
W3B	Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. (Tray /area under the Baler)	C3 Minor	31/01/26 <u>not completed</u>
W4A	Please send up-to-date copy of your WAMITAB certificate	Action Only	31/01/26 <u>Completed</u>
W4B	Submit outstanding waste returns for the last two years	C4 No impact	31/01/26 <u>Completed</u>

**Background**

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

**ELV OPERATIONS**

The site is permitted 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
<b>STORAGE</b> 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). 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).	i) 16 01 04 End of life vehicles **  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"> <li>Maximum storage capacity 100 vehicles stored on an Impermeable Pavement with a sealed drainage system.</li> <li>Maximum storage capacity 1000 vehicles.</li> <li>Maximum storage capacity 50 tonnes, not exceeding 10 tonnes of hazardous waste.</li> <li>Maximum storage time of 1 year prior to disposal or 3 years prior to recovery.</li> </ul> <p><b>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.</b></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 Rhymney 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**

During the inspection it was reassuring to see that the raised pavement that was badly damaged on the last inspection on 4 November 2025, has now been repaired. Please continue to 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.

**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.

**Deadline for all repairs to be carried out is 31 March 2026**



**Photos 1 & 2 showing the raised pavement damaged on inspection on Nov 25**



**Photos 3 & 4 showing the raised pavement now repaired on Feb 26**

At the time of the inspection, the drip tray underneath the baler had overspilled onto an area with no sealed drainage. With the river Rhymney 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 &amp; 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"> <li>• Immediate action shall taken to contain the spillage and prevent liquid from entering surface water drains, water courses and unsurfaced ground;</li> <li>• the spillage shall be cleared immediately and placed in alternative appropriate containers;</li> <li>• the Agency shall be informed immediately.</li> </ul>



Photos 5 & 6 showing drip tray on inspection on Feb 26

**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 March 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 taken 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 7 & 8 showing inspection chamber of the interceptor on Feb 26**

**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.

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### **Technical Competency**

The site TCM (Technically Competent Manager) is Ashley Griffiths, a copy of the certificate has been sent and is valid until 5 December 2027.

### **Waste Returns**

On the last inspection November 2025, we had not received any waste returns for a number of years, we have since received waste returns for the last two years, these have been submitted to the Waste returns team. Thank you for submitting these, please continue to submit waste returns annually as a summary record of the waste types and quantities accepted and removed from the site.

### **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 that there is still 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.

Officers noticed that the piles of black bags filled with what appeared to be residual waste were still there, see photo 13 below, the site manager advised that he had made arrangements for the waste to be removed but he was not on site on the day they came to collect it, so they wouldn't take it. Please arrange to have this waste collected as soon as possible.



**Photo 9 showing black bags filled with waste, from inspection on Feb 26**

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

If you have any issues with this report, please contact Carla Curtis on [carla.curtis@naturalresourceswales.gov.uk](mailto: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 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](mailto: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](mailto: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.