

Compliance Assessment Report CAR_NRW0051135

Permit being assessed: AP3194FU.

For: H K Motors, Ruabon, **held by:** Williams H K; K; D H; A K; C A; I J And N G Williams

At: Ruabon, Wrexham, Clwyd, LL14 6RG.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/03/2026 between 13:30 and 14:20.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Ian Williams, Owner, on 20/04/2026.

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	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	1.1.1 table 1.1, schedule 5 ELV Regulations 2003
W4A - Waste - Information - Records	Assessed (A)	

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	Please ensure all work which poses fire risk is always attended and checked afterwards by at least one member of staff. Should there be any run off it needs to be contained as soon as possible	20/04/2026
W1A	Please ensure ELVs are fully depolluted if stored on permeable ground. Oily parts must be stored in appropriate,	04/05/2026

Criteria	Action needed	Complete by
	weatherproof containers.	

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 20th March 2026 Natural Resources Wales officer attended site.

This was an unannounced routine inspection for permit AP3194FU.

The weather was dry and windy.

Mr Williams, owner, was present during the inspection which started with a general conversation about current activities on site.

As the officer spoke to the owner a member of staff was working on an ELV in the cutting area, next to the main building. The ELV caught fire and was attended to by the owner who put the fire out.

Later on, a run off was seen in this area, please see the photo below. It was pointed out to one of the employees who then applied saw dust to absorb the run off.

Action: Please ensure all work which poses fire risk is always attended and checked afterwards by at least one member of staff. Should there be any run off it needs to be contained as soon as possible. For immediate compliance.



Fire run-off with visible oily sheen

Depollution area

The depollution area was checked, all hazardous fluids and batteries were stored within the correct containers.

Main yard

The officer then walked around the site.

A number of End of Life Vehicles (ELVs) were seen stored correctly on impermeable ground, some in rows and others stacked.

Several of them were stored directly on permeable ground at the back of the site, on a grass verge. The officer was unable to check all of them as the access was difficult and the vehicles were stored very close together in places.

The majority of ELVs looked fully depolluted; however, two of the checked vehicles still had fluids in place, which is a breach of the permit condition stated below.

Permit condition **1.1.1** states “ No waste management operations shall be authorised by this licence unless specified in and undertaken in accordance with the limitations in the following table.

Table 1.1 Specified waste management operations.

Keeping/Storage Undrained vehicles – Stored in areas with impermeable pavement and sealed drainage system provided in accordance with condition 2.1.2 Maximum storage 4 vehicles (...)

The issue was raised with the site owners at the end of site inspection who stated the vehicles would be depolluted immediately.

This permit breach has been assigned a **C3** non-compliance score.

Action: Please ensure that all vehicles stored on permeable ground are fully depolluted to minimise the risk of pollution. For immediate compliance.



Undepolluted ELVs on verge at the rear of the site.

As the vehicles on the verge looked as though they'd been stored there for a long time Mr Williams was reminded of the Landfill Directive 1993/31/EC which states that the maximum storage times for waste stored at a site are **1 year** prior to **disposal** and **3 years** prior to **recovery**;

You must ensure that waste vehicles on site do not exceed these timeframes.

It states in section **1.5.4** of the EMS, that depolluted motor vehicles will be stored up to a maximum of **24 months**.

Mr Williams said the ELVs had not been stored there for longer than 2 years and they are regularly being recovered or disposed of.

Engine storage

It was noted that waste engines containing oil residues were being stored in open top containers. This was raised with the owner who stated that a cover had been ordered but there's been a delay.



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: Please ensure oily parts are stored in an appropriate container with weatherproof cover.

Please comply by the **4th of May 2026**. Once the cover has been delivered and installed please send a photographic proof to NRW.

Waste transfer notes

A selection of waste transfer notes was checked in the office and appeared in order.

Thank you for assisting with the inspection.

Kind regards,

Boguslawa

Boguslawa.pierzchala@cyfoethnaturiolcymru.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.