

Compliance Assessment Report CAR_NRW0051998

Permit being assessed: VB3597TS.

For: Gmh Vehicle Dismantlers, **held by:** Gmh Vehicle Recyclers Limited

At: Rumney, Cardiff, Glamorgan, CF3 2EH.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/03/2026 between 09:00 and 17:00.

Parts of permit assessed: 2d, 1.1.1, 30.

NRW Lead Officer: Marc Campbell.

Report sent to: operator, operator, on 28/05/2026.

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	C3 Minor	2d
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	30

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

Total non-compliances recorded	Total non-compliance score
2	8

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 keep your site diary, incident reports, working plan, EMS available at all times	11/06/2026
W3B	you must ensure the interceptor drain is clear of debris and regularly cleared to allow hydro carbons to be able to flow freely into it	11/06/2026

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

Waste Regulation Officer Marc Campbell visited GMH Vehicle Recyclers Limited, The Old Army Camp, Mardy Road, Rumney, Cardiff, CF3 2EH on the 19/03/2026 to conduct a routine site inspection and to assess compliance with the environmental permit EPR-VB3597TS

The operator holds a bespoke environmental permit.

The site is a vehicle dismantlers and scrap storage facility.

On arrival at site, we were met by the site manager, Mr Parry, who kindly showed us around.

The weather on the day of inspection was sunny, dry with no wind.

Site inspection:

W1A - General management - Category 3 (C3) breach

The permit condition 2d states: Subject to the terms of this licence, the site shall be operated in accordance with the Working Plan.

All waste permits that were issued prior to 6 April 2008 and do not explicitly include Condition '1.1, General Management', Natural Resources Wales (NRW) is required to assess, categorise and score compliance as if Condition 1.1 were present.

All waste permit holders whose permits were granted before 6th April 2008 are now required to have an Environmental Management System as per Part 3 (1) of The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018.

Regulatory guidance confirms that for permits that lack Condition 1.1 Natural Resources Wales (NRW) must apply this condition and scores must be based on it.

Permit condition 1.1, General Management

1.1.1 *The activities shall be managed and operated:*

(a) In accordance with a management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and complaints.

b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

Following the inspection, we have issued you with a C3 breach of your permit due to the following documents not being available on request: the **permit, working plan/ environmental management system, site diary and incident reports**.

Mr Parry advised that these documents were kept in the Technically Competent Manager's (TCM) office which at the time was locked due to the TCM being on leave. As per the permit condition (state the permit condition number here), these documents must be readily available to all staff and visitors at all times.

In addition, the working plan submitted to us in 2011 states:

The following documents shall be used to record events at the site:

a) The site diary, to record significant events and activities taking place on site on a daily basis

b) Incident report forms, to record emergencies, problems with waste received and details of rejected loads

c) Waste records, detailing input waste, empty weight, weight of waste delivered, time and date of delivery, hauliers, waste category and unique reference number

d) Waste transfer notes

e) Consignment notes (in and out)

f) Visitors book.

The records will be kept securely at the site office where they will be available for inspection by the Environment Agency during operating hours.

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Action:

Ensure the documents (the **permit, working plan/ environmental management system, site diary and incident reports**) are kept in a location where they are readily available to all staff and visitors at all times and that they are kept up to date.

The site manager advised the Environmental Management System (EMS) was updated in 2023.

We have no records of the most up to date EMS, please provide it within two weeks from the date this CAR form has been issued.

W3B - Emissions of substances not controlled by emission limits

– Category 3 (C3) breach

Permit condition – 30 states: *All drainage systems shall be adequately maintained. For this purpose, all sealed sumps shall be regularly inspected and emptied often enough to prevent their contents overflowing.*

Following the inspection, we have issued a C3 breach of your permit due to identification that the drain for the interceptor was partially blocked and in need of cleaning. Photograph 1 below shows the condition of the drain on the day of inspection. Mr Parry provided evidence showing that the interceptor was cleaned by Slicker Recycling in 2025. He also advised us that the interceptor is cleaned every 6 months or when necessary.

Action: The drainage for the interceptor must be cleared and free of debris and able to allow water to flow freely into it. Please provide an update confirming this has been done.



Photograph 1- A photo of the interceptor drain

Areas assessed as compliant and other comments can be found below.

It was noted the site was all concrete with no rutting and adequate drainage for surface water runoff. No hydrocarbons were visible around the vehicle shells which were correctly stored as shown on the photograph 2.



Photograph 2 – Car shells stored in rows on concrete

The waste oil storage was in good condition with a concrete bund wall surrounding it. No visible hydrocarbons present outside of the bunded area as shown on the photograph 3.



Photograph 3 – waste oil storage within bund wall

I want to thank Mr Parry for taking time to show us around the site.

If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Marc Campbell

Email: Marc.campbell@cyfoethnaturiolcymru.gov.uk

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.