

Compliance Assessment Report CAR_NRW0051944

Permit being assessed: ZB3793HN.

For: Dragon Works, **held by:** City Metals (U K) Limited

At: Saltney, Chester, Cheshire, CH4 8RW.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/05/2026 between 12:20 and 13:20.

Parts of permit assessed: waste returns, waste storage and acceptance, TCM, EMS, site information board.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Mike Green, owner, on 02/06/2026.

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)	
W4B - Waste - Information - Reporting	C3 Minor	Condition 7.2.2 of your permit requires you to submit within one month of the end of each quarter a summary of waste quantities and types accepted on to and removed from site for that quarter
W1A - Waste - Management - General management	C3 Minor	Table 4.4 of the site permit (and section 4.8.5.3 of site EMS
W1A - Waste - Management - General management	C3 Minor	1.2.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General	Action only (X)	

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

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Please place the site information board on the main gate or near the main gate so the information is fully accessible at all times. Especially in case of an emergency. Please comply by the 9th of June 2026.	09/06/2026
W4B	Please submit the outstanding waste returns by no later than the 23rd June 2026	23/06/2026
W1A	Please store all oily parts in appropriate, weatherproof container. For immediate compliance	03/06/2026
W1A	Please remove all metal containers from site and provide duty of care documentation. Please comply by the 30th June 2026.	30/06/2026
W1A	Please ensure a copy of the site permit is available in the site office. For immediate compliance	03/06/2026
W1A	Updated EMS has been received by NRW and will be reviewed. Comments will be shared with the permit holder.	02/06/2026
W1A	Please provide current certificate for the site TCM and attendance logs for the past three months (March to May 2026). Please comply by the 9th of June 2026	09/06/2026

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

On Tuesday the 19th of June 2026 Natural Resources officers attended at City Metals UK Limited to conduct an unannounced site inspection.

The site is operational: however, no activities were taking place at the time of the inspection.

The officer met with the site manager who explained that parts of the site are being used by other businesses (not waste management).

A number of IBCs were seen on site which are being used for storage of waste oil.

An S2 waste exemption is in place.

As the officer walked around the site, empty oil containers were seen in storage skips belonging to City Metals. Please see below photos.



Empty cooking oil containers in skips

The manager explained that they had been accepted from the exemption holder to be recycled. The officer asked if the manager was aware of this specific waste EWC code and whether this code was listed as permitted to be accepted at the site. The manager was unsure and was also unable to locate the permit to check what codes are listed as permitted.

The manager was reminded that duty of care documents for any waste accepted on site should be completed and retained.

Storage of oily parts

It was also noted that oily parts were mixed with the cooking oil containers and stored in an open-top skip with no cover. Please see the below photos.





Oily parts stored with empty cooking oil containers in an open top skip

Storage of depolluted cars

Depolluted cars were seen stored on impermeable surface. These were checked and had been fully depolluted.

Site information board

Condition 3.1 .1 of the permit states that no wastes shall be received at the site until an identification board has been provided at or near the site entrance.

The information board was seen and it displayed all relevant information. At the moment it is placed on the site's office. It's noted that the information might not be readily available when the site is closed with the main gate locked.

Action: Please place the site information board on the main gate or near the main gate so the information is fully accessible at all times. Especially in case of an emergency. Please comply by the **9th of June 2026**.

As a result of the site inspection the following non-compliances have been identified:

(W4B) Reporting - Waste Returns

Condition 7.2.2 of your permit requires you to submit within one month of the end of each quarter a summary of waste quantities and types accepted on to and removed from site for that quarter.

Prior to the site inspection a review of the waste returns submissions for permit ZB3793HN has been completed. Q3 and Q4 2025 and Q1 2026 have not been submitted, this has subsequently been

scored as a **C3 breach** against the above permit condition.

Action: Please submit the outstanding waste return by no later than the **23rd June 2026**.

(W1A) General Management

Storage of oily parts:

In accordance with **Table 4.4** of the site permit (and section 4.8.5.3 of site EMS), engines and oily parts require to be stored in 'dedicated appropriate containers that are fit for purpose'

Oily parts were seen stored with empty cooking oil containers in an open-top skip. This issue has been raised and discussed with the management previously.

This has subsequently been scored as a **C3 breach** against the above permit condition.

Action: Please remove all metal containers from site and provide duty of care documents by the **30th of June 2026**.

(W1A) General Management

Waste acceptance:

Empty cooking oil metal containers seen stored in a skip would likely be classed as chapter “15” waste stream. This code is not listed on Appendix A – Permitted waste list and therefore this is a breach of the below permit condition:

Permit Condition **1.2.1** states: No waste other than those which are categorised below in table 1.2 and specified in detail in Appendix A to these conditions shall be accepted at the site.

This has subsequently been scored as a **C3 breach** against the above permit condition.

Action: Please remove all metal containers from site and provide duty of care documentation. Please comply by the **30th June 2026**.

Copy of the site permit

Action: Please ensure a copy of the site permit is available in the site office. For immediate compliance.

Any waste streams that the management is unsure of should not be accepted at the site until a check is conducted and it's confirmed that the waste is permitted.

(W1A) General Management

Environmental management system - EMS

A draft Environmental Management System (EMS) was received from the operator and assessed as insufficient.

Comments were sent back to update the draft and re-submit for further assessment .

This matter has been discussed with the site manager and the permit holder.

Actions detailed in the Compliance Assessment Report (CAR form)NRW0041603, NRW0044596 and NRW0050051 required the operator to submit an updated version of EMS for assessment. The latest date being the **16th of January 2026**.

On the **27th of May 2026** the permit holder sent the updated version to NRW stating this was due to sending it to the wrong email address before.

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

An operator should have an appropriate management system for the activities that they are undertaking, they should also review the system at an appropriate frequency.

The document will be assessed and comments will be shared with the permit holder.

W1A) General Management

TCM- Technically Competent Manager

Action: Please provide current certificate for the site TCM and attendance logs for the past three months (March to May 2026). Please comply by **the 9th of June 2026**

Should you have any questions or wish to discuss the report, please find my contact details below.

Kind regards,

Boguslawa Pierzchala Waste regulation Officer (Waste Regulation Team)

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.