

Compliance Assessment Report CAR_NRW0051943

Permit being assessed: YP3194FU.

For: Flintshire Commercial Dismantlers, **held by:** Sarah McGilloway

At: Station Road, Greenfield, Holywell, Flintshire, CH8 7EP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/05/2026 between 13:20 and 13:35.

Parts of permit assessed: waste acceptance, waste storage, TCM, Waste returns.

NRW Lead Officer: Boguslaw Pierzchala.

Report sent to: Sarah Mc Gilloway, Owner, on 04/06/2026.

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	Schedule 1 – Operations, Table S1.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	C4 No impact	Condition 4.2.2

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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 the batteries are placed in the appropriate containers as soon as they are removed from a vehicle. For	04/06/2026

Criteria	Action needed	Complete by
	immediate compliance.	
W1A	Please ensure all vehicles are fully depolluted if stored on permeable ground. For immediate compliance	04/06/2026
W1A	Please clarify what the vehicles shown in the photo are, and what is the purpose of storing them in the yard.	12/06/2026
W1A	Please provide the site's TCM attendance for the past three months – March to May 2026	19/06/2026
W4B	The missing annual waste returns for 2023,2024 and 2025 must be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk	03/07/2026

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 Wednesday the 20th of May 2026 NRW officer attended the site to carry out an unannounced, routine inspection. The site owner, Sarah McGilloway, was not present, and the officer was let in by a member of staff to inspect the site.

The weather was dry and sunny.

The yard was quiet with no other employees present.

(W1A) General management

Containment and storage of waste

The front yard appeared tidy and well-maintained. Some of engines were stored indoors on impermeable surface.

Depollution area

There were no vehicles being depolluted at the time of the inspection.

Several batteries were seen stored on the floor in the depollution area next to the battery box. Please see photos below.



Batteries stored on the ground in the depollution area.

Action: Please ensure the batteries are placed in the appropriate containers as soon as they are removed from a vehicle. **For immediate compliance.**

The officer then walked around the yard where End-of-life vehicles- ELVs, are stored.

The ELVs were stacked up 2 or 3 high in the main yard. Several vehicles were checked. One contained liquid which had not been removed. Please see the photo below.



ELV stored in the yard which hasn't been fully depolluted

Schedule 1 – Operations, Table S1.1 activities, Limit of activities states:

Depolluted cars may be stored on either hardstanding or an impermeable surface with sealed drainage. **All other waste must be stored on an impermeable surface with sealed drainage.**

A **Category 3** non-compliance score has been given for this permit breach.

Action: Please ensure all vehicles are fully depolluted if stored on permeable ground. **For immediate compliance.**

This has been brought to the employee's attention who stated the vehicle would be depolluted on the day.

It was noted that several vans, which appeared to be ELVs, were stored in the right-hand side yard, when facing the office from the road. This yard is not included in the permitted site plan.

Action: Please clarify what the vehicles shown in the photo below are, and what is the purpose of storing them in the yard. Please comply by the **12th June 2026**.



Vans stored to the right of the office

(W1A) General management

The Environmental Management System (EMS) and Fire Prevention and Mitigation Plan (FPMP).

Section 2.5.1 of the permit describes improvement plans specified in table S1.3 stating that the site shall submit an Environment Management System (EMS) & FPMP to Natural Resources Wales for approval within 3 months of the permit being issued; The variation of the permit was issued in

November 2017.

Updated version of EMS and FPMP had been submitted to NRW for assessment. It would appear that the final version has not been agreed. Comments will be sent separately to the permit holder.

Technically Competent Manager - TCM

Site attendance guide for technically competent manager states:

“The technically competent manager must be in a position to direct activities on the site. This will be reflected in the operator’s management system and operational procedures. There is a minimum site attendance of one hour a week on all operational sites. This includes in-house facilities taking their own waste. A week runs from Sunday at midnight and ends on the following Sunday at midnight”

WAMITAB qualification and TCM coverage

At the moment the site benefits from external TCM.

Action: Please provide the site’s TCM attendance for the past three months – March to May 2026 by no later than the **19th of June 2026**.

Waste returns

Waste Return Review of the waste returns submissions for permit **EPR-YP3194FU** has been completed.

Condition **4.2.2** of your permit requires you to submit within one month of the end of each calendar year a summary of waste quantities and types accepted on to and removed from site for that year.

Natural Resources Wales have not received any waste returns for the years 2023, 2024 and 2025

This issue was raised during previous site inspection as Waste Returns had not been submitted for 2023 and 2024.

Action Required

The missing annual waste returns for 2023, 2024 and 2025 must be submitted to waste.returns@cyfoethnaturiolcymru.gov.uk no later than the **3rd of July 2026**.

A **Category 4** non-compliance score has been given for this permit breach.

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

Kind regards

Boguslaw Pierzchala

Waste regulation Officer (Waste Regulation Team)

Email: boguslaw.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.