

Waste Audit Report

This form will report compliance with environmental legislation as detailed in this report and as determined by an Officer of Natural Resources Wales

Permit Number	WP3498FW	Ref	HWARCC0009
Operator / Permit holder	JAB 93 Car Dismantlers		
Date	02/06/2026		
Premises	Installation	Waste Permit	X
		Exemption	
		Producer	
		CBD	
Site contact (s)	Thomas Joyce		
Officer's name (s)	Craig Coleman	Date issued	03/07/2026

Section 1 Assessment Summary – Hazardous Waste

The assessment in this section is based on the requirements of *The Hazardous Waste (Wales) Regulations 2005*

A detailed explanation of any non-compliances identified and actions you may need to take are given in sections 2 & 4 below.

Compliance Summary

Compliance check type	Assessed during audit	Non-compliance identified
HW Consignment notes (waste received)	Not assessed	N/A
HW Consignment notes (waste removed)	Yes	Yes
Mixing / treatment of hazardous waste	Not assessed	N/A
HW Records and returns	Yes	Yes
Storage	Yes	No

Section 2 – Waste Assessment Report Detail

Introduction

This audit has been undertaken as part of a national interceptor project being delivered across Wales by Natural Resources Wales' Hazardous Waste Team. The project aims to assess site drainage infrastructure at permitted waste facilities and to ensure that waste arising from interceptors and associated site drainage are correctly assessed and classified. Specifically, the project seeks to verify that this waste is classified in accordance with Technical Guidance WM3 and that permitted facilities across Wales are complying with the requirements of the Hazardous Waste (Wales) Regulations 2005. Through this work, NRW aims to improve consistency in waste classification and reduce the risk of misclassification of interceptor-derived wastes.

Site Report

NRW Hazardous Waste Officers Craig Coleman and Daniel Grant attended JAB 93 Car Dismantlers, Heol Ffaldau, Brackla Industrial Estate, Bridgend, CF31 2AJ on 2 June 2026, as part of NRW's targeted inspection programme focusing on site drainage and interceptor systems. The site operates under Environmental Permit EPR/WP3498FW for the storage and treatment (depollution and dismantling) of end-of-life vehicles (ELVs) and is registered as a hazardous waste premises under premises code CAF640. The site manager present was Thomas Joyce.

During the site visit on 2 June 2026, NRW officers inspected the hazardous waste generated on site, how it is stored, and how the site drainage infrastructure manages potentially contaminated run-off. JAB 93 Car Dismantlers operates as an end-of-life vehicle depollution and dismantling facility. While the permit allows for the recycling and reclamation

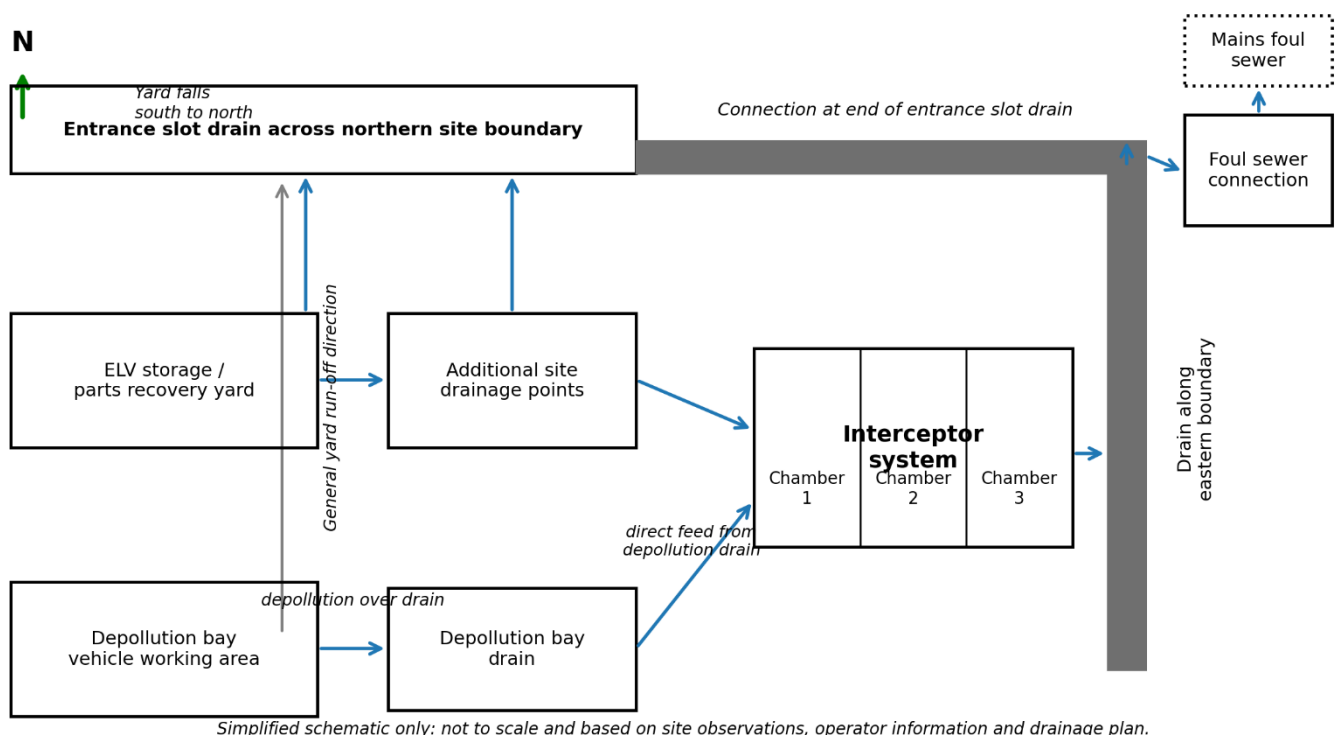
of metals and metal compounds, the site does not routinely operate as a scrap metal facility. The site contained a large number of vehicles retained for parts recovery, with vehicles remaining on site until recoverable components and materials have been removed.

Depollution was taking place on arrival, although work stopped during the NRW visit. The site has a dedicated depollution bay where vehicles are lifted using site plant and depollution activities are undertaken over a drain discharging directly to the interceptor system. Hazardous wastes generated through depollution include waste oils, hydraulic oils, antifreeze, brake fluid, oil filters, lead acid batteries and dirty granules arising from spill clean-up or minor losses of vehicle fluids.

Storage arrangements were inspected during the visit. Hazardous waste storage was generally located indoors, to the rear of the depollution bay. Waste oils, hydraulic oils, antifreeze, brake fluid, oil filters, lead acid batteries and dirty granules were stored separately, with most liquid wastes stored in drums and batteries stored in dedicated battery boxes. Mr Joyce advised that batteries are tested where possible and may be resold where suitable. The arrangements observed were generally suitable, with hazardous wastes segregated and no unauthorised mixing observed. Some signage and labelling was aged, dirty, damaged or faded, and the operator should review signage across hazardous waste storage areas to ensure it remains clear and legible.

The site surface was observed to be impermeable and in generally good condition at the time of the visit. The site drainage is arranged to follow the fall of the yard from south to north, with run-off directed towards a slot drain at the site entrance. Additional drainage points within the site also feed into the interceptor system. The depollution bay includes a drain beneath the working area, and vehicles are depolluted over this drain. Drainage from the depollution bay discharges directly to the interceptor system.





Access to the chamber associated with the entrance slot drain was obstructed by a vehicle at the time of the visit. The chamber could not be inspected because the site crane operator was not available to move the vehicle. This limited NRW's ability to fully inspect this part of the drainage system during the visit, and the chamber should be made accessible and checked during a future site inspection to confirm its condition.

The interceptor system receives drainage from operational areas where ELVs are depolluted and where hazardous wastes and vehicle fluids may be present. The drainage plan provided indicates a foul line and connection to the mains sewer. Following treatment through the interceptor system, site drainage is understood to discharge to the foul sewer network. Subsequent enquiries made by NRW with Dŵr Cymru Welsh Water have confirmed that the site holds a valid consent for discharge to the foul sewer.

A drain above the depollution bay was observed to be blocked during the visit. The blockage appeared to consist of dirt, silt and grit bound together with oily residues. Given that this drain receives run-off from an operational area where ELV depollution takes place, material removed from the drain should be appropriately assessed, classified and consigned where required.



The operator did not confirm when the drainage system or interceptor was last cleaned. The consignment notes reviewed as part of this audit did not clearly evidence a recent interceptor or drainage cleaning movement. The operator should therefore confirm when the interceptor and associated drainage system were last cleaned and provide supporting records, including any waste transfer notes or hazardous waste consignment notes where applicable.

Site records were made available during the visit and were generally well kept and organised. Documents requested by NRW officers were readily accessible. Waste returns were available on request and appeared to be in good order. Training records were not checked as part of this assessment. The site maintained a stock of replacement filters for the interceptor system. The technical information provided identifies the interceptor as a SPEL Purceptor Class 1 full-retention separator, incorporating a coalescer unit and automatic closure device. The manufacturer's information states that periodic emptying of retained light liquids and sludge is essential to maintain optimum performance, with maintenance frequency dependent on site conditions.



Site Report Summary

Overall, the site demonstrated generally suitable hazardous waste storage arrangements, with wastes segregated and stored indoors in labelled drums or dedicated containers. The drainage system is arranged to collect run-off from operational areas and the depollution bay before passing through the interceptor system. However, access to the entrance slot drain chamber was obstructed during the visit, the second interceptor chamber could not be inspected, a drain above the depollution bay was blocked, and the last cleaning date for the drainage system or interceptor was not confirmed. The inferred discharge route to foul sewer should also be evidenced by the operator.

Site Report Actions

The operator should confirm the lawful discharge route from the interceptor system, make the entrance slot drain chamber and second interceptor chamber accessible for inspection, clear the blocked drain above the depollution bay, and confirm when the interceptor and associated drainage system were last cleaned. Supporting records should be retained, including drainage/interceptor maintenance records and waste transfer notes or hazardous waste consignment notes where applicable. The operator should also review aged or damaged signage across hazardous waste storage areas to ensure it remains clear and legible.

Please refer to Section 4 of this report for further details regarding the compliance points identified.

Consignment note audit

Following the visit, Craig Coleman requested documentation including consignment notes for hazardous waste streams arising from site operations, with particular focus on interceptor related waste and other hazardous waste arisings. Consignment notes reviewed: CAF640/CE72FLG/13 (mineral oil, EWC 130205, 29/07/2025) – PureClean Environmental / Slickers Recycling; CAF640/184295 (antifreeze, oil filters, brake fluid, 14/08/2025) – PureClean Environmental; CAF640/LP19FDC/3 (antifreeze, oil filters, brake fluid, 03/12/2025) – PureClean Environmental; JAB93/00035 (lead acid batteries, EWC 160601, 10/12/2025) – Bayliss Metals, Bridgend; CAF640/CE72FLG/5 (29/01/2026) – PureClean Environmental; CAF640/LP19FDC/10 (antifreeze, oil filters, brake fluid, 24/03/2026) – PureClean Environmental.

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

The hazardous waste audit has been carried out:

- To measure compliance with the regulations;
- To make sure that hazardous waste is managed properly without polluting the environment or harming people's health or seriously affecting the local area;
- To make sure that registers and records, such as quarterly returns from sites that receive hazardous waste are accurate.

Our purpose was to review the company's compliance with environmental legislation and where appropriate to provide advice and guidance to assist in identifying and delivering improvements.

Audit Findings

The main findings of the audit are set out in the following sections. These will be followed by either **Actions** or **Recommendations**.

Actions indicate that we are requiring you to deliver this to meet your legal obligations. In general, these will tell you what you must do, not how to do it. These are not optional, and will normally be supported by:

- a timescale, within which the action must be delivered; and/or
- Interim measures, that must be taken until such time as the action is delivered.

Recommendations are not themselves requirements and typically provide further advice and guidance on:

- how to deliver a required action, for example we might indicate how another company has successfully dealt with this issue;
- aspects of best practice;
- Potential improvements that reduce the risk of problems occurring in future.

Hazardous waste premises registration

JAB 93 Car Dismantlers is registered as a hazardous waste premises with Natural Resources Wales under premises code CAF640. This is compliant with Regulation 21 of the Hazardous Waste (Wales) Regulations 2005.

1) Hazardous Waste Consignment Note Part A – Notification Details

Part A was generally completed to a satisfactory standard across the notes reviewed. The hazardous waste premises code (CAF640) and site address (JAB 93 Car Dismantlers, Heol Ffaldau, Brackla Industrial Estate, Bridgend, CF31 2AJ) were consistently and correctly recorded on the majority of notes. However, on consignment note CAF640/CE72FLG/5 (29/01/2026), the destination site code (field A3) was not completed. Under Regulation 35 of the Hazardous Waste

(Wales) Regulations 2005, all sections of the consignment note must be completed before the waste leaves the premises. The omission of the consignee's site code in A3 constitutes a non-compliance with the Regulations. Part A on all other notes reviewed (CAF640/LP19FDC/3, CAF640/CE72FLG/13, CAF640/LP19FDC/10, CAF640/184295, and JAB93/00035) was completed to an acceptable standard.

2) Hazardous Waste Consignment Note Part B – Description of Waste

Part B was completed to a satisfactory standard on the majority of notes reviewed, with appropriate EWC codes, waste descriptions, quantities and hazard properties generally recorded. However, on consignment note CAF640/CE72FLG/5 (29/01/2026), Part B is entirely blank. No EWC code, waste description, quantity (kg), chemical or biological concentration, physical form, or hazard code has been recorded. Only "1 EACH" appears in the container field, providing no meaningful identification of the waste being consigned. This constitutes a fundamental and serious non-compliance with Regulation 35 of the Hazardous Waste (Wales) Regulations 2005 and renders the consignment note legally invalid as a record of a hazardous waste movement. Notes CAF640/LP19FDC/3, CAF640/LP19FDC/10 and CAF640/184295 recorded EWC codes 160114 (antifreeze), 160107 (oil filters) and 160113 (brake fluid) with appropriate quantities, hazard properties and chemical concentrations. Note CAF640/CE72FLG/13 recorded EWC 130205 (mineral oil, 700 kg) with hazard codes HP5, HP7 and HP14. Note JAB93/00035 recorded EWC 160601 (lead acid batteries, 1,032 kg and 1,004 kg) Part B is considered broadly compliant for all remaining notes.

3) Hazardous Waste Consignment Note Part C – Carrier's Certificate

Part C was completed to an acceptable standard on the majority of notes reviewed, with carrier names, registration numbers, vehicle registration details and signatures generally present. However, on consignment note CAF640/184295 (14/08/2025), the carrier name field is blank and the signature section is annotated "No Signature Received". Under Regulation 35 of the Hazardous Waste (Wales) Regulations 2005, the carrier is required to certify receipt of the consignment by providing their name, carrier registration number and signature. The absence of both the carrier name and signature constitutes a non-compliance with the Regulations. On all remaining notes reviewed, the carrier details were completed to an acceptable standard. PureClean Environmental (carrier registration CB/DU225945) collected waste on the majority of notes, with vehicle registrations LP19FDC and CE72FLG recorded as appropriate. Part C is considered compliant on notes CAF640/LP19FDC/3, CAF640/CE72FLG/5, CAF640/CE72FLG/13, CAF640/LP19FDC/10 and JAB93/00035.

4) Hazardous Waste Consignment Note Part D – Consignor's Certificate

On consignment note CAF640/184295 (14/08/2025), the consignor's name is recorded solely as "Diana T" without a full printed name. Under Regulation 35 of the Hazardous Waste (Wales) Regulations 2005, the consignor's certificate must include the full printed name of the consignor alongside their signature. An abbreviated name does not adequately satisfy this requirement and constitutes a non-compliance. On consignment note CAF640/CE72FLG/13 (29/07/2025), the consignor's name appears in an unclear or illegible form. While a signature is present, the operator is reminded that consignor names must be legible and printed clearly on all notes to ensure accountability and traceability of hazardous waste movements. On consignment note JAB93/00035 (10/12/2025), a consignor signature and date are present but a clearly printed consignor name is not evidenced in Part D. The full printed name of the consignor is required in accordance with Regulation 35 and its absence constitutes a non-compliance. On notes CAF640/LP19FDC/3, CAF640/CE72FLG/5 and CAF640/LP19FDC/10, consignor names (Diane Thomas / Diana Thomas / Mervin Thomas on behalf of JAB 93 Car Dismantlers) were present and Part D is considered broadly compliant for these notes.

5) Hazardous Waste Consignment Note Part E – Consignee's Certificate

Part E (the consignee's certificate) was available for review on notes CAF640/LP19FDC/3 and CAF640/LP19FDC/10 only. On both notes, Part E was completed by Liam Graham on behalf of PureClean Environmental, citing waste

management permit WML26057. Waste management operation codes (R04 for oil filters; R13 for antifreeze and brake fluid) were recorded and wastes were confirmed as accepted. Part E is considered compliant for these two notes. Part E was not available for review for consignment notes CAF640/CE72FLG/5, CAF640/CE72FLG/13, CAF640/184295 or JAB93/00035. Under Regulation 35 of the Hazardous Waste (Wales) Regulations 2005, the consignee is required to complete Part E of the consignment note to certify receipt of the waste and the hazardous waste producer/holder must retain a copy. The absence of consignee certificates for four of the six notes reviewed indicates that either the certificates have not been received from the consignees or have not been retained on site. This constitutes a non-compliance with the record-keeping requirements of the Regulations.

6) Consignee Return Data

Not assessed.

Consignment Note Summary

This audit focused on the compliance of JAB 93 Car Dismantlers with the Hazardous Waste (Wales) Regulations 2005, following a site inspection on 2 June 2026 as part of NRW's targeted inspection program focusing on site drainage and interceptor systems.

The site demonstrated a generally satisfactory standard of compliance with hazardous waste management requirements. Hazardous wastes were segregated with no evidence of unauthorised mixing, and storage arrangements were generally suitable, with wastes stored indoors in labelled drums or dedicated containers. The impermeable pavement and sealed drainage infrastructure were in generally good overall condition. Site records were made available during the visit and were generally well kept and organised; waste returns were available on request and appeared to be in good order. Training records were not checked as part of this assessment.

The principal non-compliances identified relate to consignment note completion and record keeping. The most significant single non-compliance is consignment note CAF640/CE72FLG/5 (29/01/2026), on which Part B is entirely blank. A consignment note with no waste description, EWC code or quantity recorded does not constitute a valid record of a hazardous waste movement and is fundamentally non-compliant with Regulation 35 of the HWR 2005. Additional non-compliances include: missing carrier name and signature on note CAF640/184295 (Part C); abbreviated or unclear consignor names on notes CAF640/184295, CAF640/CE72FLG/13 and JAB93/00035 (Part D); and missing consignee certificates (Part E) for four of the six notes reviewed. Infrastructure matters identified include the obstructed entrance slot drain chamber, the inaccessible second interceptor chamber, the blocked drain above the depollution bay, the need to evidence the final discharge route to foul sewer, and the need to confirm when the interceptor and associated drainage system were last cleaned.

Consignment Note Actions

To achieve full compliance with the Hazardous Waste (Wales) Regulations 2005 and Waste Management Licence WP3498FW the operator should:

Review and implement procedures to ensure all hazardous waste consignment notes are fully and accurately completed before waste leaves the site, in accordance with Regulation 35 of the HWR 2005. In particular, the circumstances relating to consignment note CAF640/CE72FLG/5, on which Part B is entirely blank, should be investigated, and the operator must be satisfied that all waste described in this movement is accounted for and properly documented. Ensure that Part E consignee certificates are obtained from consignees for all hazardous waste movements and retained on site. Where consignee certificates have not yet been received, the operator should contact PureClean Environmental, Slickers Recycling and Bayliss Metals as appropriate to obtain copies for notes CE72FLG/5, CE72FLG/13, 184295 and JAB93/00035. Ensure that all future consignment notes include the full and legibly printed name of the consignor in Part D alongside their signature, in compliance with Regulation 35 of the HWR

2005. Ensure that the carrier name, carrier registration number and carrier signature are completed in Part C of all future consignment notes prior to waste collection.

The operator should also provide evidence confirming the lawful discharge route from the interceptor system to the foul sewer network. The entrance slot drain chamber and second interceptor chamber should be made accessible for inspection, and the blocked drain above the depollution bay should be cleared. The operator should confirm when the interceptor and associated drainage system were last cleaned and retain supporting records, including drainage/interceptor maintenance records and waste transfer notes or hazardous waste consignment notes where applicable. Any waste arising from interceptor or drainage cleaning must be appropriately assessed, classified and consigned. The operator should also review aged or damaged signage across hazardous waste storage areas to ensure it remains clear and legible. Training records were not checked as part of this assessment but should be retained and made available for inspection when requested.

Implementing these measures will strengthen duty of care, reduce regulatory risk and ensure full compliance with the Hazardous Waste (Wales) Regulations 2005 and the requirements of Environmental Permit EPR/WP3498FW.

Please refer to Section 4 of this report for further details regarding the compliance points identified.

Please note, all actions relevant to your site permit will be passed on to your site regulatory officer and this is something they may wish to follow up further with you on their next site inspection.

If you have any questions about the contents of this report, please do not hesitate to contact me.

Regards,

Craig Coleman

Hazardous Waste Regulation Officer E-mail: craig.coleman@cyfoethnaturiolcymru.gov.uk

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.

Section 3-Enforcement Response

Only one of the boxes below should be ticked

You must take immediate action to rectify any non-compliances noted in section 1 and prevent repetition. Non-compliance with environmental legislation may result in enforcement action being taken, including criminal prosecutions. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	X
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where non-compliance has been identified in section 1 this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Non-compliance identified	Action Required / Advised	Due Date
Final discharge route from the interceptor system was inferred from drainage information but not evidenced during the visit.	Provide evidence confirming the lawful discharge route from the interceptor system, such as relevant Dŵr Cymru Welsh Water documentation, trade effluent consent where applicable, or invoice/account information confirming connection to the foul sewer network.	Within 28 days of this report
Access to the chamber associated with the entrance slot drain was obstructed by a vehicle and could not be inspected during the visit.	Make the entrance slot drain chamber accessible for inspection and confirm its condition. Ensure access to drainage infrastructure is maintained to allow inspection and maintenance.	Within 28 days of this report
The second interceptor chamber was inaccessible at the time of inspection and could not be inspected.	Make the second interceptor chamber accessible and confirm its condition. Ensure all interceptor chambers remain accessible for inspection, servicing and maintenance, and retain records of any maintenance undertaken.	Within 28 days of this report
Drain above the depollution bay was blocked with material appearing to consist of dirt, silt, grit and oily residues.	Clear the blocked drain above the depollution bay. Any material removed from the drain must be appropriately assessed, classified and consigned where required.	Immediate
The interceptor must be emptied and cleaned within 28 days of this report by a suitably competent contractor. Any wastes removed from the interceptor must be appropriately assessed, classified and consigned in accordance with relevant waste legislation. Records of the cleaning works and waste movements must be retained.	Arrange for the interceptor to be inspected and cleaned by a suitably competent contractor. Any wastes removed from the interceptor must be appropriately assessed, classified and consigned in accordance with relevant waste legislation.	Within 28 days of this report
Records demonstrating recent interceptor cleaning and maintenance were not available during the audit.	Provide NRW with records confirming completion of the interceptor inspection and cleaning, including maintenance records and any associated waste transfer notes or hazardous waste consignment notes.	Within 28 days of this report
Hazardous waste storage signage and labelling was present but some signage was aged, dirty, damaged or faded.	Review signage and labelling across hazardous waste storage areas to ensure it remains clear, legible and fit for purpose.	Within 28 days of this report
Consignment note CAF640/CE72FLG/5 (29/01/2026) – Part B entirely blank: no EWC code, waste description, quantity, physical form or hazard code recorded. Destination site code (A3) also missing.	Investigate the circumstances of this waste movement and ensure it is properly documented. Implement procedures to ensure all future consignment notes are fully completed before waste leaves the site in accordance with Regulation 35 of the HWR 2005. Ensure Part A, including destination site code, is completed on all future notes.	Immediate
Consignment note CAF640/184295 (14/08/2025) – Part C carrier name and signature absent; Part D consignor name recorded as 'Diana T' only.	Ensure all future consignment notes include the carrier's full name, registration number and signature in Part C, and the consignor's full printed name alongside their signature in Part D.	Immediate

Part E consignee certificates were not retained on site for notes CAF640/CE72FLG/5, CAF640/CE72FLG/13, CAF640/184295 and JAB93/00035.	Contact the relevant consignees, including PureClean Environmental, Slickers Recycling and Bayliss Metals as appropriate, to obtain and retain Part E certificates for all outstanding consignment notes.	Within 28 days of this report
Missing, abbreviated or unclear printed consignor names were identified on consignment notes CAF640/184295, CAF640/CE72FLG/13 and JAB93/00035.	Ensure all future hazardous waste consignment notes include the full and legibly printed name of the consignor alongside their signature.	Immediate

Section 5 - Compliance notes

To ensure you correct actual or potential non-compliance we may

- λ advise on corrective actions verbally or in writing
- λ require you to take specific actions in writing
- λ issue a notice

Non-compliance with environmental legislation is an offence and we may take legal action against you.

λ We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

λ Enforcement action may include the issue of a formal caution or prosecution.

λ Dependent upon the type of offence committed, a civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response.

See our Enforcement and Civil Sanctions guidance for further information

Not all legal requirements were assessed as part of this audit. It remains your responsibility to ensure that you comply with all relevant environmental legislation and maintain suitable records to evidence your compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by Natural Resources Wales to fulfill its regulatory and monitoring functions. Natural Resources Wales may also use and/or disclose it in connection with:

- λ offering/providing you with its literature/services relating to environmental matters
- λ consulting with the public, public bodies, and other organisations (e.g., Health and Safety Executive, local authorities) on environmental issues
- λ carrying out statistical analysis, research and development on environmental issues
- λ investigating possible breaches of environmental law and taking any resulting action
- λ preventing breaches of environmental law
- λ assessing customer service satisfaction and improving its service
- λ Freedom of Information Act/Environmental Information Regulations request.

Natural Resources Wales may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

[Customer charter](#)

What do I do if I disagree with the report or have a complaint?

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.