

Compliance Assessment Report CAR_NRW0051838

Permit being assessed: SP3098FU.

For: Tanygroes Metal Recycling, **held by:** Tanygroes Car Dismantlers Ltd

At: Tanygroes, Cardigan, Ceredigion, SA43 2JP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/05/2026 between 10:00 and 11:32.

Parts of permit assessed: See criteria listed below.

NRW Lead Officer: Luke Taylor, accompanied by Daniel Grant, Gillian Coates.

Report sent to: Stuart Dunseath, TCM, on 15/06/2026.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.2
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.2
W1A - Waste - Management - General management	C3 Minor	3.1.2
W1A - Waste - Management - General management	Action only (X)	

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
W3B	Move the waste oil and IBC's to an area with the required	08/05/2026

Criteria	Action needed	Complete by
	secondary containment.	
W3B	Empty the interceptor, ensuring that the waste is removed to an authorised facility and inspect the components, including the coalescing units, to ensure correct operation. Provide evidence that this has been completed to NRW	31/07/2026
W1A	Clear the crushing area drain in A7 and provide evidence to NRW of this, along with waste transfer notes for the most recent removal of waste from the sealed underground tank referenced.	31/07/2026
W1A	Fully review and update the working plan/management system to ensure it is accurate and reflects operations on site. Supply a copy to NRW for review.	31/07/2026

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This compliance assessment report is being produced following an inspection conducted by Luke Taylor (Senior Officer - Waste Regulation), Dan Grant (Senior Officer - Hazardous Waste Regulation) and Gillian Coates (Hazardous Waste Regulation) of Natural Resources Wales (NRW).

The inspection was focused on compliance with hazardous waste regulations and the management of the site interceptor and discharge.

The weather at the time of the inspection was dry and bright, the officers were accompanied throughout by the site Technically Competent Manager, Stuart Dunsheath. The site was operational at the time.

The following non-compliance were identified:

W3B Emissions of substances not controlled by emission limits - Permit Condition 3.1.2 - Category 3 Breach

Your permit states under the above condition, that 'the engineered site containment and

drainage systems shall be designed, constructed, inspected, validated and maintained, and shall be fully documented and recorded, to be fit for purpose and meet the standards specified in Table 3.1 below and in accordance with section 2.1 of the working plan'.

Table 3.1 Site Containment and Drainage Standards, under heading 4. 'Storage areas for tanks, skips, drums and other containers' states that 'All tanks (and their associated inlet and outlet pipes and valves) which are used for the storage or treatment of wastes shall be stored within a bunded or silled area with impermeable pavement, which include the areas specified in appendix 8 working plan, and shall be isolated from the drainage system.'

During the inspection it was noted that there were approx twelve containers, some open, within the parts storage building opposite the depollution bay containing waste oils. None of these has any secondary containment provided.



You must ensure that these are stored with secondary containment, which is designed and constructed to contain 110% of the volume of the largest container or tank.

When inspecting the interceptor area, officers observed two IBCs containing what looked like waste oil, one of which was cracked on the top. You stated to the officers that these IBCs were used to store liquid waste removed from the interceptor, allowing it to separate further, and any water then drained back into the interceptor through the opening of the release valve at the base, with the remaining waste being removed from site as waste oil, under the associated waste code, rather than as interceptor waste. These IBCs had no secondary containment, which is required regardless of them being on the same pad with drainage opening to the interceptor.

The contents of the interceptor cannot be treated in this manner, and this activity must cease immediately. The waste contents of the interceptor must be removed to an authorised facility, with the correct list of waste code applied.

These above breaches both relate to failure to provide secondary containment and have been consolidated under a single category 3 score as a result.

ACTION - Move the waste oil and IBCs to an area with the required secondary containment. Deadline is set as the day of the inspection, as these actions need to be addressed immediately.

W3B Emissions of substances not controlled by emissions limits - Permit Condition

3.1.2 Category 3 Breach

When the officers asked how often the interceptor was emptied, you were unsure of the last time this was carried out, only that it had been drained down and inspected approx four years prior. The industry recommendation is that interceptors such as this, including the coalescing filter media, are to be inspected every six months. The officers inspected the first and third chambers of the three stage interceptor, along with the discharge chamber on the site boundary. When inspecting the discharge, there was evidence of silt discharge on the outlet pipe coming from the interceptor and a lot of silting within the chamber. When an interceptor is functioning correctly, there should be no visible silt discharging from the outlet pipe, which indicates that the interceptor has reached its capacity and requires emptying.

Table 3.1 referenced above also states, under '7. Sealed Drainage Systems' where the discharge is to surface water and is permitted as part of this waste management licence the discharge shall pass through a Class 1 oil interceptor which shall be operated and maintained in accordance with good operational practice.

ACTION - Empty the interceptor, ensuring that the waste is removed to an authorised facility and inspect the components, including the coalescing units, to ensure correct operation. Provide evidence that this has been completed to NRW. Deadline 31/07/2026

W1A General Management - Permit Condition 3.1.2 - Category 3 Breach

During the inspection, officers viewed the crushing area, marked A7 on the site plan within the working plan. Section 2.1, referenced above, states under Site Drainage a) that during crushing operations in area A7, a valve will be turned to direct all run off from the crushing area into a sealed underground tank. This tank will be emptied as required and all transfer notes will be kept. At the end of each crushing operation the area will be cleaned and the valve opened to allow surface run off from area A7 to drain to the oil interceptor (area 9).

It was evident at the time of the inspection that the area had not been cleared for some time, with a significant amount of debris and residue having built up over the drain.



You must ensure that this area is cleared immediately following the conclusion of any crushing operations taking place so that the drainage system is not compromised.

ACTION - Clear the crushing area drain in A7 and provide evidence to NRW of this, along with waste transfer notes for the most recent removal of waste from the sealed underground tank referenced. Deadline 31/07/2026.

W1A General Management - Schedule 9, Part 3 Environmental Permitting (England and Wales) Regulations 2016 - Action Only

The above legislation inserted the requirement that you as an operator must manage and operate the waste operation in accordance with a system (a “written management system”), described in a document or documents, which identifies and minimises the risks of pollution arising from the waste operation.

Following on from the last compliance inspection in December 2025, a copy of the Working Plan was provided to NRW officers. This document has not been updated or amended for approx 20 years. Whilst the fundamental operations of the site may not have changed a great deal, there have been changes, such as the location of certain waste storage, the fuel tanks on site etc. To be considered compliant, a management system should include the required information as set out in the document 'How to comply with your environmental permit' which can be found on our website here:

[How to comply with your environmental permit](#)

You must review your management system when there are changes on site, in your activities and/or equipment, if you are applying for a variation to your permit or if there is an accident, complaint or breach of your permit. You stated that this review is now under way.

**ACTION - Fully review and update the working plan/management system to ensure it is accurate and reflects operations on site. Supply a copy to NRW for review.
Deadline 31/07/2026**

If you wish to discuss any aspect of this Compliance Assessment Report, please contact me:

luke.taylor@cyfoethnaturiolcymru.gov.uk

Regards,
Luke Taylor

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.