

Compliance Assessment Report CAR_NRW0052623

Permit being assessed: EB3038RW.

For: Lelo Metal Recycling Ltd, **held by:** Lelo Metal Recycling Ltd

At: Craig Lelo Works, Gwyddelwern, Corwen, Denbighshire, LL21 9SD.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2607314).

On: 09/07/2026 between 11:20 and 12:00.

Parts of permit assessed: 1.1.1, 4.4.1.

NRW Lead Officer: Boguslaw Pierzchala, accompanied by Molly Callow.

Report sent to: Gari Jones, owner, on 13/08/2026.

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	Permit condition 4.4.1, FPMP condition 1.3.3, Table 4.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	EMS Table 1.3 - Waste storage table
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4C - Waste - Information - Notification	Action only (X)	

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	Ensure the storage walls comply with the site EMS band FPMP . In the interim, ensure all waste is stored below the maximum height of the storage walls to reduce fire and pollution risk.	04/09/2026
W1A	Please provide records of the FPMP testing for the 2026	04/09/2026
W1A	Ensure ELVs are stored in compliance with the site EMS	13/08/2026
W1A	Ensure batteries are stored in appropriate containers under weatherproof cover	13/08/2026
W1A	Please provide TCM's attendance details from the 1st of January to the 13th of August 2026	28/08/2026
W1A	Please assess all surfaces and ensure they are kept in good condition, are constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the surface.	13/08/2026
W1A	As per condition 1.3.1 f the FPMP, please review the current FPMP and submit an up-to-date version. Submit reviewed EMS for assessment	09/10/2026
W4C	Please provide Schedule 5 required information	28/08/2026

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 the 8th of July 2026 NRW received notification about a fire at Lelo Metals Ltd.

On the 9th of July 2026 NRW officers attended at Lelo to conduct a follow-up site inspection.

The site was last inspected On Friday the 19th of December 2025.

The officers met with Gari Jones, site owner, who accompanied officers throughout the inspection. The officers were invited into the office to discuss the incident.

The source of the ignition is being investigated. The officers were informed that the fire started in one of the storage bays, marked as Area 8 on the site plan.

The fire was contained within the site boundaries. The run-off was contained in the site interceptor and later on removed by a contractor. Duty of care documents have since been received by NRW and are being reviewed.

The officers walked around the site, starting with Area 8.

On inspection, it transpired that the side concrete walls in this area were around 2 metres high on one side, and around 3 metres high on the other. Please see photos below.

The height of the waste stored in bays appeared to be higher than the back and side walls.

Storing waste above the height of storage walls elevates the fire risk with the possibility of the fire-affected waste overspilling onto neighbouring areas and other waste.

W1 General management

Permit condition 4.4.1 of the site permit states : "The operator shall manage and operate the activities in accordance with a written fire prevention and mitigation plan using the current, relevant fire prevention and mitigation plan guidance."

FPMP condition 1.3.3. states: "Reference should be made to the table below which details the methods and procedures to maintain compliance with Section 24 of the FPMP guidance. Table 1.1 Monitoring procedures

Site monitoring :

Item: Waste stacks and separation distances are in accordance with your FPMP

Method: Suitably trained operational staff will ensure all stockpiles are stored in line with Drawing No. LELO/509/03.

Table 4.1 – Waste Storage Area Details describes the details for all waste storage areas, with Area 8 described as having 5m high fire wall.

This has been discussed with the site owner, who assured the officers the walls will be extended to comply with the site EMS and FPMP.

This breach has been assigned a CCS **C3** score.

Action: Ensure the storage arrangements comply with the site EMS/FPMP by the **4th of September 2026**. In the interim, ensure all waste is stored below the maximum height of the storage walls to reduce fire and pollution risk.

FPMP condition 1.3.3 states: "Reference should be made to the table below which details the methods and procedures to maintain compliance with Section 24 of the FPMP guidance. **Table 1.1 Monitoring procedures**

Item: Ensure periodic testing of fire prevention and mitigation equipment is carried out

Method: The site will undergo a full testing of the FPMP every 6 months to ensure all fire-fighting equipment is suitable including containment. Any items which are considered damaged will be replenished as soon as practicable.

Action: Please provide records of the FPMP testing for the 2026. Please comply by **4th of September 2026**.



Waste stored above the height of the dividing wall



Waste spilling over the dividing wall



Waste stored above the height of the dividing wall



Burnt waste



Waste piles heights significantly above the dividing wall levels



Waste overspilling at the back of the concrete bay

W1 General management

Storage of End-of-Life Vehicles(ELVs)

As officers walked around site it was noted that ELVs were stored in the area marked Area 7 on the site plan , according to the plan this area is designated to store Sorted/segregated scrap metal (light iron) with the maximum height of 2m.

The storage of the ELVs was 5 vehicles high in places, significantly exceeding the height of the dividing wall. Please see photos below.



Storage of ELVs on site

EMS Table 1.3 - Waste storage table states that ELVs should be stored in area 9 which is clearly separated from other waste with a circular space around the storage pile, which would work as a fire break in the event of a fire.

This has been discussed with the site owner and subsequently been scored against the permit condition as a CCS C3 breach.

Action: Ensure ELVs are stored in compliance with the site EMS/FPMP. For immediate compliance

The officers then walked towards the storage areas located to the side of the main building.

This part of the site looked tidy and well-organised. It also benefits from new storage bays and improved impermeable surfaces.

Please ensure the heights of the walls are adequate to the height of the waste being stored in them and are compliant with the site plan.

Storage of batteries

It was noted that a number of boxes containing batteries were stored outside in a newly created storage bay. The bay provides some weather protection. Please ensure all sides are weatherproof to prevent ingress and egress of water.

Several boxes were damaged and appeared unsuitable for the storage of batteries. Please see photographs below.



Current batteries storage bay.



Damaged storage boxes containing waste batteries

This issue has been raised with the management on previous occasions.

Section 2.4.2 of the site permit states: “Treatment of waste batteries and accumulators must meet the minimum requirements set out in Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC”

Annex III, PART A: TREATMENT, (...)2. States: Treatment and any *storage, including temporary*

storage, at treatment facilities shall take place in sites *with impermeable surfaces and suitable weatherproof covering or in suitable containers*.

This has been discussed with the site owner on previous occasions and subsequently been scored against the permit condition as a CCS C3 breach that has been consolidated with others in the criteria.

This has been logged as 'action only' in the results table above as it has been consolidated with the other CCS score

Action: Please ensure the batteries are stored in appropriate containers with weatherproof cover at all times. **For immediate compliance**

W1 General management

Technically Competent Manager - TCM

Action: Ian Kenney is currently the TCM for Lelo Metals. Please provide TCM's attendance details from the 1st of January to the 13th of August 2026. Please comply by the **28th of August 2026**.

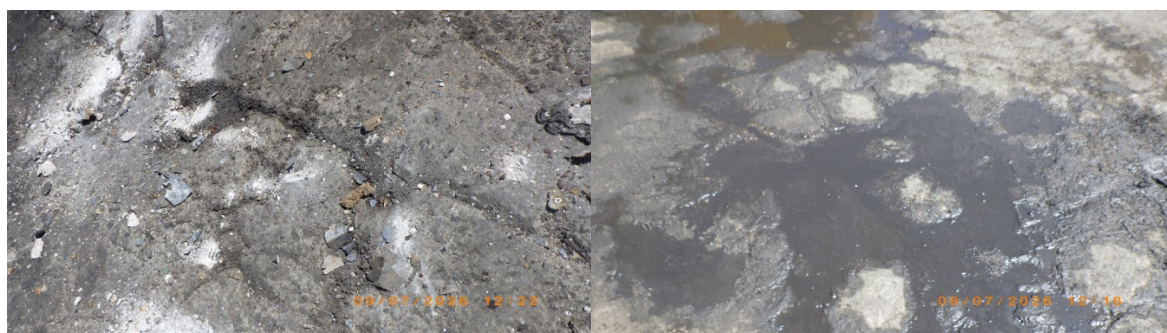
(W1) General Management

Impermeable surface

The impermeable surfaces looked damaged in places. The cracks did not appear to have gone through the full thickness of the surface; however, the storage surfaces need to be repaired to prevent any potential pollution entering the ground. Please see the below photos.

Schedule 1- operations of the site permit, **Table S1.1**, states: "All hazardous and non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage."

Action: Please assess all surfaces and ensure they are kept in good condition, are constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the surface. **For ongoing compliance**



Impermeable surfaces showing signs of damage



(W1) General Management

Fire Prevention and Mitigation Plan (FPMP)

The site benefits from an a FPMP.

Action: As per condition 1.3.1 f the FPMP, please review the current FPMP and submit an up-to-date version by the **9th of October 2026**.

Environmental Management System (EMS)

It was noted that several changes have been made to the site layout and storage areas.

Please review and update your EMS to reflect those changes.

Action: Submit reviewed EMS for assessment by the **9th of October 2026**.

(W3D) Noise and vibration – The site was operational at the time of inspection. The noise deemed to be at acceptable levels.

(W4C) Notifications

Permit condition 4.3 Notifications 4.3.2 states: “Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.”

To date NRW have not received Schedule 5 – Notification. Please provide the required information by no later than **28th of August 2026**.

Thank you for your time during the inspection.

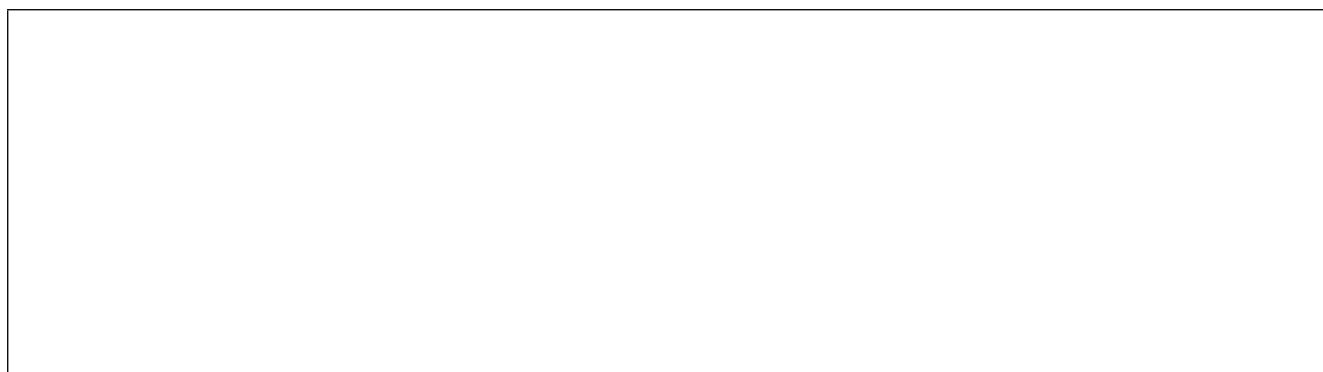
Kind regards,

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.