

Compliance Assessment Report CAR_NRW0052219

Permit being assessed: WP3395FT.

For: Twyn Dismantlers Ltd, **held by:** Caleb Griffiths

At: Fleur-de-leys, Blackwood, Caerphilly, NP12 3UL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 17/06/2026 between 12:30 and 13:45.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Mark ogorman.

Report sent to: Ashley GRIFFITHS , Technically Competent Manager (TCM, on 17/08/2026.

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	C2 Significant	1.2.2
W2A - Waste - Operations - Permitted activities	C3 Minor	3.1.2
W2D - Waste - Operations - The site	C2 Significant	5.4.1
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	C2 Significant	5.1.4

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

Total non-compliances recorded	Total non-compliance score
4	97

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	You are required to update and improve your current EMS with a plan outlining how you will address the issues highlighted in this Compliance Assessment Report in order	30/09/2026

Criteria	Action needed	Complete by
	to prevent future occurrences and ensure future compliance with your environmental permit.	
W2A	Please undertake repairs of the areas of hardstanding upon which depolluted vehicles are stored. It is important to ensure that areas of hardstanding are constructed and maintained so that water does not pool and compromise the integrity of the surface. Please also undertake immediate repairs of the raised pavement separating the impermeable surface from hardstanding to ensure that this area is sealed such that no liquids can bypass it and run on to the hardstanding.	30/09/2026
W2D	Review tyre storage arrangements and implement the necessary measures to ensure full compliance with the requirements set out in Table 5.4 and provide NRW with copies of the waste transfer notes for all tyres removed from site.	31/08/2026
W3B	Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. This baler needs to be moved to a more suitable location.	30/09/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report (CAR) has been completed following a site inspection undertaken on Wednesday 17 June 2026 at Twyn Car Dismantlers Ltd, Fleur De-Lys. Environmental Permit number EPR – WP3395FT.

Present: Ashley GRIFFITHS – Technically Competent Manager (TCM)

Carla CURTIS – Waste Regulation Officer, Natural Resources Wales

Mark O'GORMAN – Waste Regulation Officer, Natural Resources Wales

This was a routine, un-announced site inspection. The weather at the time of the visit was

overcast and it had been raining before we arrived.

List of Actions/Breaches from last site inspection 4 February 2026

<u>Criteria</u>	<u>Action needed</u>	<u>Assessment result</u>	<u>Complete by</u>
<u>W1A</u>	<u>You are required to update and improve your current Environment Management System (EMS). It is vital that your EMS reflects the activities being undertaken on site and how they are carried out to minimise any risks.</u>	<u>C3 Minor</u>	<u>30/06/26</u> <u>Not completed</u>
<u>W2A</u>	<u>Please undertake repairs of the areas of hardstanding upon which depolluted vehicles are stored. Please also undertake immediate repairs of the raised pavement separating the impermeable surface from hardstanding to ensure that this area is sealed such that no liquids can bypass it and run on to the hardstanding.</u>	<u>C3 Minor</u>	<u>31/03/26</u> <u>partially completed</u>
<u>W2D</u>	<u>Ensure all black bin bag are removed as shown in photos 11 and 12 and send photos to show this has been actioned,</u>	<u>Action Only</u>	<u>31/01/26</u> <u>completed</u>
<u>W3B</u>	<u>Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. (Tray /area under the Baler)</u>	<u>C3 Minor</u>	<u>31/01/26</u> <u>not completed</u>
<u>W4A</u>	<u>Please send up-to-date copy of your WAMITAB certificate</u>	<u>Action Only</u>	<u>31/01/26</u> <u>Completed</u>
<u>W4B</u>	<u>Submit outstanding waste returns for the last two years</u>	<u>C4 No impact</u>	<u>31/01/26</u> <u>Completed</u>

-

Background

The permit for the site is currently held by Mr. Caleb GRIFFITHS, although day to day running of the site and all associated paperwork is undertaken by the Technically Competent Manager, Ashley GRIFFITHS.

ELV OPERATIONS

The site is permitted to store a maximum of 100 fully depolluted end of life vehicles (ELV's) containing neither liquids nor hazardous components, on hardstanding and a maximum of 100 ELV's on impermeable pavement with sealed drainage, as detailed in Table 2.1 of the permit, shown below; During the inspection it was noted that, whilst the storage of such vehicles appeared disorganised, they were being stored in accordance with permit conditions.

Housekeeping again was observed to be poor, but all fluid types removed as part of the

depollution process were being stored adequately in separate containers in bunded storage areas.

Drainage

Whilst on site, officers viewed the inspection chamber of the interceptor and noted the level of liquid was very high. Officers were informed that the interceptor is due to be emptied and cleaned in August 2026, with the levels observed in the chamber already almost at maximum, we would strongly recommend that the interceptor is emptied and serviced as soon as possible and then regularly thereafter. (See photo 1)



Photo 1 - inspection chamber of the interceptor high level of liquid

Action: Please arrange for the interceptor on site to be emptied and cleaned as soon as possible and copies of paperwork forwarded to Natural Resources Wales. Please also ensure that a suitable timetable for maintenance is implemented to prevent such situations from arising in the future.

Deadline: 31 August 2026

General

As noted during previous inspections, the site remains excessively cluttered with areas served by sealed drainage systems, being used for the storage of residual wastes. Poor site organisation and housekeeping on site these areas continue to limit the effective use of these areas and increase the risk of non-compliance with the environmental permit.

Significant improvements to site infrastructure, layout and housekeeping are required to ensure activities on site can be carried out in full compliance with the permit.

Significant quantities of tyres were observed being stored in clusters all around the site, including in the bushes close to the river (see photo 2,3 & 4). The operator stated that collection of the tyres is being arranged.

Condition 5.4.1 of your permit states;

“ Residual waste shall only be handled and stored on the site in accordance with the standards specified in Table 5.4 below.”

Table 5.4 Standards for handling and/or storage of residual wastes	
Storage requirement	Specified standards
a) End of life vehicle fluids	i) Unless otherwise agreed in writing with the Environment Agency, all fluids drained from vehicles shall be segregated by type and stored in separate, appropriate tanks, which are fit for purpose. The tanks shall be clearly and unambiguously labelled regarding their contents. ii) Fluids shall only be stored in areas provided with an impermeable pavement and a sealed drainage system provided in accordance with condition 3.1
b) Batteries, oil filters, oil contaminated parts, PCB/PCT containing condensers, components identified as containing mercury and brake pads containing asbestos.	i) Once removed from vehicles, these components shall be segregated by type and stored within dedicated appropriate containers which are fit for purpose. The containers shall be clearly and unambiguously labelled regarding their contents. ii) These components shall only be stored in areas provided with an impermeable pavement and a sealed drainage system. iii) Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a lid to prevent ingress of surface water.
c) Tyres, air bags and liquefied gas tanks.	i) Once removed from vehicles, these waste types shall be stored in separately designated areas provided with an impermeable pavement and sealed drainage in accordance with condition 3.1 ii) Tyres shall be stored in stable stacks with individual capacities of no greater than 50 cubic metres and to a height of no greater than 3 metres iii) Individual tyre stacks shall not be stored within 6 metres of each other iv) Individual tyre stacks shall not be stored within 15 metres of the site boundary or building v) Tyre stacks shall not be located within 10 metres of any area used for flame cutting operations.
d) Uncontaminated plastic, glass and ferrous and non-ferrous metal wastes arising from the treatment of end of life vehicles	These materials shall be stored in areas with hardstanding or impermeable pavement.



Photos 2, 3 & 4 Showing large volume of tyres also in the bushes near the river

The above breach of Condition 5.4.1 has been scored a Category 2 breach under – W2D - Handling and storage of residual waste.

Action: Review tyre storage arrangements and implement the necessary measures to ensure full compliance with the requirements set out in Table 5.4 and provide NRW with copies of the waste transfer notes for all tyres removed from site.

Deadline 31 August 2026

Management System and Operating Procedures

Whilst it is evident that your current permit is very outdated, it is clear that the absence of a fully functional Environment Management System (EMS) is contributing to many of the failures on site. It is vital that your EMS reflects the activities being undertaken on site and how they are carried out to minimise any risks. All risks need to be identified, and processes put into place and documented as to how these risks are managed in order to prevent harm to the environment or human health and to ensure full compliance with permit conditions and any directly applicable legislation.

Condition 1.2.2 of your permit states;

“Storage and treatment operations of waste motor vehicles shall meet the requirements of Schedule 5 of the ELV Regulations. Infrastructure and equipment provided to meet these obligations shall be maintained in working order and shall be used to give effect to their purpose.”

Furthermore, all waste permits granted before 6 the April 2008 are required to have an Environmental Management System as per Part 3 (1) of The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018

The above breach of Condition 1.2.2 has been scored a Category 2 breach under W1A – General Management. (The breach is not an offence; however, we have the power to serve an enforcement notice for this breach. Failure to comply with the notice is an offence.)

Action – You are required to update and improve your current EMS with a plan outlining how you will address the issues highlighted in this Compliance Assessment Report in order to prevent future occurrences and ensure future compliance with your environmental permit.

Deadline 30 September 2026

Site Infrastructure

Areas of hardstanding at the top of the site on which depolluted vehicles were being stored was found to be in very poor condition. There were multiple areas of significant pooling of water and concerns over the integrity, adequacy and suitability of it in its current state. In addition to this, the lower half of the site benefits from impermeable surface with a raised pavement separating it from a further area of hardstanding. This pavement should be designed to ensure that no liquids can bypass the raised sill and run onto the hardstanding. At the time of the inspection the raised pavement was badly damaged. This has been highlighted during previous inspections, (CAR) references **CAR_NRW0050844**, **CAR_NRW0049914** and **CAR_NRW0045402** and although repairs have been attempted it is unlikely to be a suitable long-term solution. It is now vital that you consider the

effectiveness of the sites current layout in conjunction with a documented environmental management system that identifies and minimises the risk of damage to areas of engineered containment. Failure to consider this will result in further deterioration of the raised pavement and could pose a threat to land and groundwater contamination as potentially hazardous liquids penetrate and bypass the current concrete sill and run onto the hardstanding. Condition 3.1.2 of your environmental permit states;

- 3.1.2** 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.

Table 3.1 Site containment & drainage standards

Type of Site Surface & Drainage	Minimum Specified Standards of Design, Construction & Maintenance
a) Hardstanding.	Areas of hardstanding shall be constructed of granular material (e.g. crushed stone, aggregate, road planings or other similar material) and maintained such that the working surface: i) shall remain even; ii) shall not be subject to settlement or differential settlement; iii) shall not be subject to rutting by vehicles even when wet; iv) shall have sufficient durability to allow cleaning for example by scraping; v) shall remain free of standing water.



Photos 5 & 6 showing the raised pavement damaged

The above breach of Condition 3.1.2 has been scored a Category 3 breach under W2A – Permitted activities.

Action – Please undertake repairs of the areas of hardstanding upon which depolluted

vehicles are stored. It is important to ensure that areas of hardstanding are constructed and maintained so that water does not pool and compromise the integrity of the surface.

Please also undertake immediate repairs of the raised pavement separating the impermeable surface from hardstanding to ensure that this area is sealed such that no liquids can bypass it and run on to the hardstanding.

Deadline for repairs to be carried out **30 September 2026**

At the time of the inspection, the drip tray beneath the crusher had overflowed onto an area of ground that does not benefit from an impermeable surface or sealed drainage. This overflow onto uncontained ground demonstrates that the current location is unsuitable for this activity. This matter has been identified repeatedly during previous inspections, (CAR) references **CAR_NRW0050844**, **CAR_NRW0049914** and **CAR_NRW0045402**. The crusher must now be moved immediately to a suitably engineered area with an impermeable surface and sealed drainage to prevent further pollution and ensure compliance with permit conditions.

Condition 5.1.4 of your permit states;

“In the event of any potentially polluting leak or spillage occurring on site, documented control and remediation procedures shall be implemented immediately and recorded and shall meet the standards specified in Table 5.1 below.”

Table 5.1 Standards for prevention & control of leaks and spillages

Action	Specified standards
a) Loading and unloading skips, drums and other containers	i) Loading and unloading of skips, drums and other containers shall be supervised at all times by a member of staff. ii) Lids/ caps/ bungs or other closures shall be in place during loading/ unloading. iii) Loading/ unloading shall be carried out in an area provided with engineered containment of the type required for that waste and of the standard of containment specified under condition 3.1
b) Filling and emptying, tanks, drums and other containers	i) Filling and emptying of tanks, drums and other containers shall be supervised at all times by a member of staff. ii) Lids/ caps/ bungs or other closures shall be in place at the end of filling iii) Containers, tanks and drums shall not be filled beyond their operational capacity. iv) Filling and emptying shall be carried out in a bunded area maintained in accordance with condition 3.1 v) Measurement of level/ void space shall be by physical dipping prior to loading.
c) Inspection, maintenance and repair of skips, tanks, drums and other containers	i) Skips, tanks, drums and other containers shall be inspected daily for leaks. ii) Any fixed tanks found to be leaking shall have their contents immediately transferred to an alternative appropriate tank or container. iii) Any skips, drums and/or other containers found to be leaking either shall be immediately transferred to a larger appropriate over-container or shall have their contents immediately transferred to an alternative appropriate tank or container.
d) Control and remediation of leaks and spillages	i) Minor spillages of oil, fuel or other end of life vehicle fluid shall be cleaned up immediately, using sand or proprietary absorbent to clean up liquids and placed in alternative containers. ii) Major spillages of oil, fuel or other end of life vehicle fluid which are causing or are likely to cause polluting emissions to the environment: • Immediate action shall taken to contain the spillage and prevent liquid from entering surface water drains, water courses and unsurfaced ground; • the spillage shall be cleared immediately and placed in alternative appropriate containers; • the Agency shall be informed immediately.



Photo 7 & 8 showing drip tray underneath the crusher/baler



Photo 9 – Side view of the crusher/baler

The above breach of Condition 5.1.4 has been scored a Category 2 breach under W3B – Emissions of substances not controlled by emission limits.

Action – Please ensure that you adhere to the measures outlined in Table 5.1 Standards for prevention and control of leaks and spillages. You must follow pollution prevention measures to ensure no emissions to land and groundwater. This baler must now be moved to a more suitable location of the site, with impermeable surface and sealed drainage.

Deadline: 30 September 2026

STATUTORY ENFORCEMENT NOTICE

In light of the continued non compliances identified during this and previous inspections, and the failure to adequately address permit breaches, NRW now intends to serve a Regulation 36 Enforcement Notice. This notice will require specified steps to be taken within defined timescales to achieve compliance with the Environmental Permit.

If you have any issues with this report, please contact Carla Curtis on

carla.curtis@naturalresourceswales.gov.uk Thank you.

In this document 'Natural Resources Wales' means the Natural Resource 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.