

Compliance Assessment Report

Report ID:
CAR_NRW0036220

This form will report compliance with your permit as determined by an NRW officer

Site	Gmh Vehicle Dismantlers	Permit Ref	VB3597TS			
Operator/Permit holder	Gmh Vehicle Recyclers Limited					
Regime	Waste Operations					
Date of assessment	20/01/2020	Time in	13:30	Out	14:05	
Assessment type	Site Inspection					
Parts of the permit assessed	Permit & operational area					
Lead officer's name	Warwick-Brown, David					
Accompanied by	Lovelock, Elysia					
Recipient's name/position	Tahir Aziz/ Director	Date issued	23/01/2020			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C1 - General Management - Staff competency/training	X	
C2 - General Management - Management system and operating procedures	X	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Compliance Assessment Report – GMH Vehicle Recyclers Ltd (EPR-VB3697TS)

Officers David WARWICK-BROWN & Elysia LOVELOCK visited GMH Vehicle Recyclers on 20/01/20 for a site inspection, and for Officer WARWICK-BROWN to be introduced as the new Site Officer. Officers met with Site Manger Rhys Parry and Company Director/Technically Competent Manager (TCM) Tahir Aziz at the site. The weather was dry and sunny. Time of inspection: 13:30-14:05.

Site inspection

The site was generally tidy and well organised during the inspection, and there were no permit breaches scored on this occasion. Rhys Parry showed Officers around the site, describing each stage of the operation.

Surfacing/drainage

Most of the site was concreted with an impermeable surface, capturing surface water run-off towards a sealed drainage system at the north of the site. A small section of the yard in the south east corner of the site consisted of an area of hard-standing, which was in the process of being concreted and updated to include a racking system for more efficient storage within the next 6 months. This main yard was used for the storage of stripped vehicles ready to be exported as steel, all of which appeared free of oils or other hazardous wastes.

The drainage system consisted of a 3-part filtering interceptor to capture waste liquids, which is frequently emptied as and when needed. Surface water then runs into the reen to the north of the site.



Image 1 – use of spill kits during the depollution process

Spill kits were readily available for depolluting vehicles and their appropriate use was evident during the inspection. Waste oils from the depollution process are stored in a sealed container and exported off site via a licensed contractor, again, as and when required.

Storage

Incoming waste consists of mostly written off vehicles and some ELV's, which are all stored on the impermeable concreted area of the site.

The vehicles are stripped into their individual components and stored within the main warehouse on site (including batteries, suitably stored within a container), before being packaged within the smaller warehouse and exported as individual products to customers.

WAMITAB Continuing Competency

During the inspection it was noted that the current WAMITAB certificate expired in 2017. The TCM is required to undertake a continuing competency test every 2 years from date of the initial qualification or from the date on the most recent continuing competency certificate. Since NRW have not inspected the site since 2016, no breaches are being scored for this non-compliance on this occasion. Please visit the WAMITAB website to book a test to obtain the required continuing competency certification:

<https://wamitab.org.uk/competence/continuing-competence/>

Action: Please email a confirmation of the test booking.

Other paperwork

All required paperwork, including consignment notes, waste returns and a copy of the Environmental Management System (EMS), was available in the site office. NRW do not currently have a copy of the EMS on file.

Action: Please email a copy of the EMS.

Actions since last inspection

No breaches were scored following the previous inspection, but advice was provided to ensure missing waste returns were submitted and to consider installing curbing to contain surface water within the vehicle storage/operational area of the yard. As mentioned, all waste returns appear to be up to date on NRW's database, and Officers were shown evidence of the curbing installed following the previous inspection.



Image 2 – curbing installed in operational area

Thank you for taking the time to meet with us at the site on this occasion.

Please contact David Warwick-Brown on 0300 065 3683 or david.warwick-brown@cyfoethnaturiolcymru.gov.uk If you have any issues with this report, and to provide any correspondence as required by this report.

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.

EPR Compliance Assessment Report

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Operator/Permit holder	Gmh Vehicle Recyclers Limited	Date	20/01/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. 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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C2	X	Please email a copy of the EMS.	28/02/2020
C1	X	Please email a confirmation of the test booking.	28/02/2020

Section 5 – Compliance notes for the Operator

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

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- 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.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW 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.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.