

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

Site	Longlife Spares	Permit Ref	BP3595FV		
Operator/Permit holder	Marcello Zaccaria				
Regime	Waste Operations				
Date of assessment	18/02/2020	Time in	10:15	Out	11:00
Assessment type	Site Inspection				
Parts of the permit assessed	See below				
Lead officer's name	Rose, Jak				
Accompanied by	Lee, Jonathan				
Recipient's name/position	Tahir Karim / Operations Manager	Date issued	25/02/2020		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	D5
B4 - Infrastructure - Containment of stored materials	C3	E2
C4 - General Management - Storage, handling labelling and Segregation	C3	E10, E11 & E7
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	E6

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	4	Total compliance score (see section 5 for scoring scheme)	12.1
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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

Officers JAK ROSE and JONATHAN LEE attended Long Life Spares, Old Colliery Yard, Llanbradach, Caerphilly CF8 3QQ at 10:15 on 18 February 2020 to carry out a visit of permit **EPR-BP3595FV** in relation to WIRS Ref: 2000916. There was light drizzle and a brisk wind at the time of visit.

Officers met with a male who told us his name was Kenny, he advised us he was working on a vehicle there. Officers advised Kenny that a site visit would be conducted. Officer advised Kenny at the end of the visit we were going to speak to him. Operations Manager Mr. Tahir Karim was not present at the time of inspection.

Breaches

B1 Infrastructure - Engineering for prevention & control of pollution – Score: Category 3 - Permit

Condition D5: *“The yard area of the facility shall be surfaced and maintained to the satisfaction of the Waste Regulation Authority...[.]”*

Officers walked around the main yard at the front of the premises. The ground itself was muddy and large volumes of rainwater was running through the yard. Due to the high level of rainfall from the previous few days this was to be expected.

The puddles in the yard showed oil pooling on the surface (Photo 2) There were also a lot of vehicles with tyres still attached and tyres being stored in random places across the yard. A number of the vehicles still had various liquids still in them, for example please see (Photo 3)

Officers began walking around the vehicles at the front of the premises and it became apparent that a lot of them had not been de-polluted. Officers checked a random vehicle to see that a volume of engine oil was still present in the engine.

The puddles in the yard showed oil pooling on the surface (See photo below) There were also a lot of vehicles with tyres still attached and tyres being stored in random places across the yard. A number of the vehicles still had various liquids still in them.

Previous visits indicate that there has been no improvements made to the yard. This must be addressed as a priority.

ACTION

Ensure the drainage system is fully sealed and that all run-off is captured by the system.
Clean up any spillages immediately via use of spill kits.



Photo: Showing oil spillage on surface of the yard.

Category 3 Breach -

B4 - Infrastructure - Containment of stored materials – Condition E2

“The types of waste and quantities stored at facility shall consist....[.]”

Officers proceeded to the boundary edge overlooking the railway line. There was a ledge dropping to around twenty feet towards the front of the premises where a large pile of **tyres** dumped in a manner that they were either pushed off from the ledge outside of the permitted boundary. (Photo below)

There was no evidence of the site having a sealed drainage system. This was apparent with the lack of hardstanding and lack of inspection chambers. The main flow of water was a culvert that was overflowing at the time of visit. The rest of the water being pushed off site down the natural slope of towards the entrance.

ACTION

Clear up and remove tyres immediately.

Deadline

24th March 2020

C4 General Management – Storage handling, labelling, segregation – Score: Category 3 - Permit

Condition E10 & E11 & E7 *“On entering the facility all waste vehicles or parts of vehicles shall be delivered to the dismantling area which is bunded and drains to the oil interceptor” & “Vehicles or other equipment containing liquids shall be drained at the dismantling area only as shown on the working plan”. “Car vehicle bodies shall not be stored to a height then 2 vehicles, and shall be stored dry (drained from fluids)...”*

Officers began walking around the vehicles at the front of the premises and it became apparent that a lot of them had not been de-polluted. Officers checked a random engine to see that a volume of engine oil was still present in the engine.

In the rear yard there were similar issues to the front. However, there seemed to be a stockpile of engine blocks in one area that looked like they had been there for a considerable amount of time

There was no hard standing for these engine blocks and the ground was boggy underfoot with a petro-chemical odour coming from the mud.

ACTION

Ensure all vehicles are fully depolluted in-line with the permit and stored in appropriate areas.



Photo – Engine bay of random vehicle with no de-pollution having taken place – taken on 18/02/20



Photo – Area showing a stockpile of dismantled engines with no hard standing. This is towards the rear of the building.

Monitoring and records, maintenance and reporting “A full record shall be kept in a form to be agreed with the Regulation Authority of wastes delivered to and removed from the facility” Score – Category 4- Permit Condition E6

There has been no Waste Return data submitted for the site to date. There was an email exchange from August 2015 asking for these to be submitted.

More information can be found on our website:

<https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/new-wales-operator-waste-return-and-deadlines-for-returns/?lang=en>

ACTION

Please submit outstanding waste return data for 2016, 2017, 2018, 2019 and 2020. Submit all future Waste Return data within the grace period.

Deadline

24 March 2020

OUTSTANDING CHARGES

There has been no annual subsistence fees for the environmental permit **EPR-BP3595FV** received. The last payment was received on 19/02/2019 for the 18/19 invoice. The outstanding amount is currently **£1395.55. If the Operator does not pay this amount in full by 24 MARCH 2020, NRW will be forced to revoke the permit which will cease all permissions to operate any waste activities on site.**

Other observations



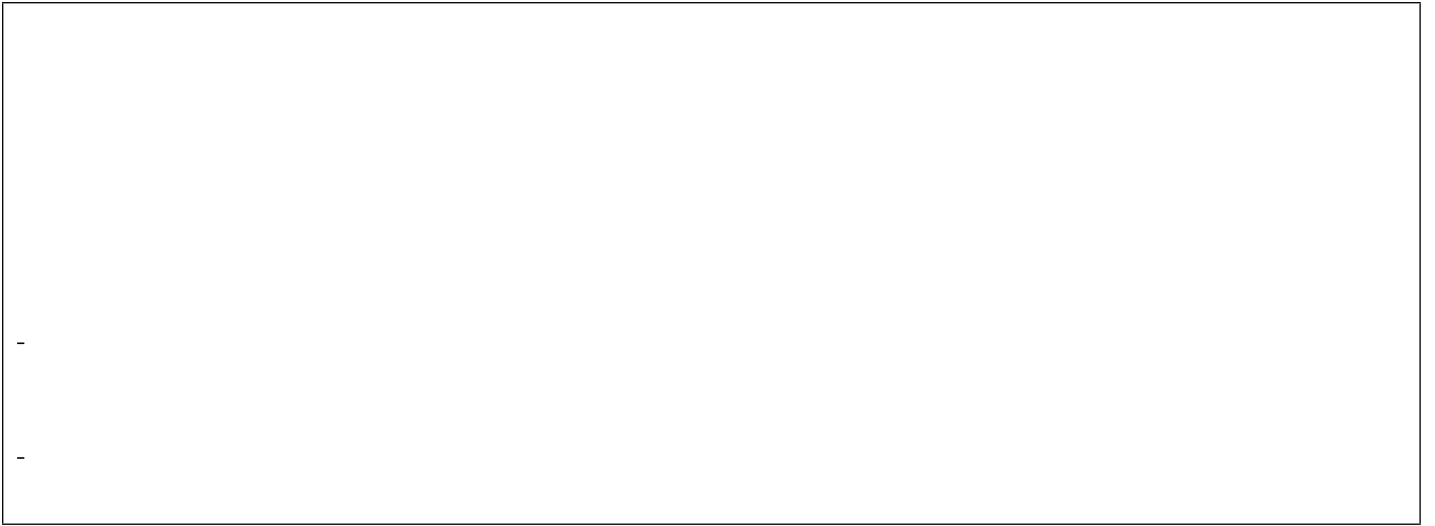
Photo– Tyres dumped off the side of the site boundary.

Officers left the premises 11:00.

If you have any issues with this report, please contact Jak Rose on 0300 065 3489 or jak.rose@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036392**

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

Site	Longlife Spares	Permit Ref	BP3595FV
Operator/Permit holder	Marcello Zaccaria	Date	18/02/2020

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.

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			
G4	C4	Please submit outstanding waste return data for 2016, 2017, 2018, 2019 and 2020. Submit all future Waste Return data within the grace period.	24/03/2020
C4	C3	Ensure all vehicles are fully depolluted in-line with the permit and stored in appropriate areas.	24/03/2020
B4	C3	Clear up and remove tyres immediately.	24/03/2020
B1	C3	Ensure the drainage system is fully sealed and that all run-off is captured by the system. Clean up any spillages immediately via use of spill kits.	24/03/2020

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.