

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

Site	Arch Motors	Permit Ref	RP3394FS		
Operator/Permit holder	Thomas Arthur Roberts				
Regime	Waste Operations				
Date of assessment	11/12/2019	Time in	10:20	Out	11:10
Assessment type	Site Inspection				
Parts of the permit assessed	see below				
Lead officer's name	Grant, Daniel				
Accompanied by	Hughes, Julie				
Recipient's name/position	Arthur Roberts/ TCM	Date issued	06/01/2020		

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
B4 - Infrastructure - Containment of stored materials	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E1 - Emissions - Air	A	
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	A	
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	

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

Routine unannounced inspection carried out at 10:20am by Daniel Grant (Hazardous Waste Regulation Officer), accompanied by Julie Hughes (Tackling Waste Crime Officer).

Weather conditions were overcast with a slight breeze, very wet underfoot. The weather shifted to heavy rain during the visit.

Purpose of the visit was for familiarisation of the site and operating procedures as this was the first visit by Daniel Grant.

Officers briefly met with Arthur Roberts (TCM) who left to go to Harlech to pick up vehicles. We had a brief discussion regarding Mr Roberts's proposals to potentially reduce the size of the operational area, we explained this might involve a part surrender of the permit.

Officers were accompanied by site operative Rachel who took us around to explain storage and processing activities on site.

Un-depolluted vehicles were stored on an impermeable surface surrounded by drainage in the southern end of the site. Site drainage was serviced last year. Two vehicles were stored outside of this concreted area on hardstanding ground and according to Rachel these were de-polluted, except for the deployment of airbags. These ELV's were used by the Fire department for training purposes and were clearly labelled for this purpose, only the airbags and shock absorbers were left intact.

ELVs meant for the FRS that have been depolluted (this includes vehicles still with shock absorbers, airbags or batteries where essential for the training) can be stored on hardstanding or an impermeable surface with sealed drainage. If any of these vehicles are un-depolluted then they must be stored on an impermeable surface with sealed drainage.

In addition, as these ELVs are still hazardous waste then any movement of this waste also requires a hazardous waste consignment note. The Fire and Rescue Service should also be aware of this requirement as it has been agreed with them.

Processed ELV's were stacked and stored appropriately on the western end of the site, none of these were checked during the visit.

A single vehicle was in the depolluting area which was on an impermeable concrete pad and surrounded by drainage.

Many tyres were stored on site which had their alloy rims removed and stored separately. Once 800-1000 tyres are collected Rachel explained that the tyres are then collected from site. Please ensure that all tyres are stored correctly within a skip on site and as per industry guidance.

Officers proceeded to the site office where discussions took place regarding site documentation. Officers asked to see site inspection sheets and an updated EMS, these were not available as they had been sent to the insurance company. It was said that these would be available by the next quarterly visit between February- March.

NRW records for hazardous waste registration show that you haven't registered as a hazardous waste producer since 2017. Within Wales, under the Hazardous Waste (Wales) Regulations 2005 if you produce or store over 500kg of hazardous waste per year at your premises, the premises are required to be registered with Natural Resources Wales every year unless exempt. Due to the nature of the operations taking place on your site, hazardous waste is likely to be produced/stored. For example, as part of the depollution process, various hazardous wastes will be produced including but not limited to, hydraulic fluids, transmissions oils, engine oils and batteries. All hazardous wastes generated should be considered to determine if the 500kg limit is exceeded.

In order to establish this and for information on if your premises maybe exempt, a detailed guidance document is available via our website:

<https://cdn.naturalresources.wales/media/1206/do-i-need-to-notify-my-premises-a-guide-to-the-hazardous-waste-regulations.pdf?mode=pad&rnd=131502044690000000>

Officers left site at 11:10.

Thank you for your time. If you would like to discuss anything mentioned in this report, please contact Daniel Grant using the below details.

Regards,

Daniel Grant, Hazardous Waste Regulation Officer.

daniel.grant@cyfoethnaturiolcymru.gov.uk

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

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036083**

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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			

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.