

Compliance Assessment Report

Report ID:
CAR_NRW0036320

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

Site	K G Matthews Auto Salvage	Permit Ref	ZP3199VK		
Operator/Permit holder	Mr Lee Matthews & Mr Sion Matthews				
Regime	Waste Operations				
Date of assessment	31/01/2020	Time in	10:54	Out	11:24
Assessment type	Site Inspection				
Parts of the permit assessed	See below				
Lead officer's name	Grant, Daniel				
Accompanied by					
Recipient's name/position	Lee Mathews/ TCM	Date issued	11/02/2020		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
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 10:54 am by Daniel Grant (Hazardous Waste Regulation Officer), accompanied by David Wilby (Senior Industry & Waste regulation Officer).

Weather conditions were overcast with a slight breeze, wet underfoot throughout.

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 Lee Mathews (TCM) and signed into the site using the sign in book.

TCM certification was sent to NRW beforehand, these are both up to date and expire in June 2020.

It was noted that the site's notice board which is erected at the site entrance was out of date. This notice board contains the environment agency contact details. It was suggested that the notice board would be changed at the same time as Lee was planning to update his contact details soon. As per the attached "How to comply with your environmental permit" document please ensure the new notice board includes the following information:

- the permit holder's name (company name at least)
- the operator's name if different (company name at least)
- an emergency contact name and the operator's telephone number
- a statement that the site is permitted by Natural Resources Wales
- the permit number
- Natural Resources Wales national numbers, 0300 0653000 and 0800 807060 (incident hotline), or any other number we subsequently notify you about in writing.

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

Depolluted vehicles and external vehicle parts, mainly bumpers, were stored on hard standing in the lower section of the site and all these surfaces appeared to be in good condition during the visit.

As the site had no weighbridge Lee explained that each vehicle was recorded as 1.2 tonne for the waste returns.

Two vehicles were in the depolluting area which was on an impermeable concrete pad. The surface area here is angled so that all waste is caught in the drain. The drain is connected to the site's oil interceptor which then discharges the clean water at the discharge point identified in site plan on the permit. Lee stated that the oil interceptor is only serviced every couple of years due to lack of usage and the top of the oil is siphoned more regular.

The oil tank was stored within a double bunded area indoors and appeared free from any leaks or spillages.

Many tyres were stored on site which had their alloy rims removed and stored separately. Although most tyres were stored in a skip some were left on the ground. 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 an updated EMS, but this was not available on the day as it was stored on the old computer, Lee agreed to send the EMS via e-mail to NRW. You need to keep your EMS up to date and continually assess it to monitor the effectiveness of your operations and make changes to your EMS if it fails or when you can see ways of improving it. This should help you to achieve and maintain compliance with your environmental permit.

Could you please send your EMS to NRW by 29 February 2020.

Officers left site at 11:24.

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 Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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EPR Compliance Assessment Report

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Site	K G Matthews Auto Salvage	Permit Ref	ZP3199VK
Operator/Permit holder	Mr Lee Matthews & Mr Sion Matthews	Date	31/01/2020

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			

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.