

Compliance Assessment Report CAR_NRW0036951

Permit being assessed: NP3995FC.

For: Parfitt Scrapyard, held by David Parfitt

At: Porters Yard, Limestone Rd, Nantyglo, Brynmawr, Blaenau Gwent, NP23 4PQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 15/09/2020 between 10:00 and 10:45.

Parts of permit assessed: 1, 2, 3, 4, 5, 6

NRW Lead Officer: Jak Rose, accompanied by Alex Bowder.

Report sent to: David Parfitt, Owner on 22/09/2020.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	C4 No impact	2.3
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Ongoing (O)	6.1.1

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

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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
C1	Provide evidence of WAMITAB certification	20/10/2020
G4	Ensure correct EWC for waste movements	20/10/2020

Action 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.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Officers Jak ROSE and Alex BOWDER attended David Parfitt, Porters Yard, Limestone Road, Brynmawr, Blaenau Gwent NP23 4ND to carry out a routine visit of permit EPR-NP3995FC. Weather conditions were dry and clear with a light wind.

No breaches/issues observed at time of inspection.

Officers were accompanied from the main yard to the depolluting bay where the vehicles are raised, chemicals are removed, and components are dismantled.

The components appeared to be segregated and stored correctly. The drums in which the chemicals are drained are segregated and are stored in a lockable outbuilding. The oil filters are not crushed on site and are left intact in one of the storage bins.

The storage of vehicles is satisfactory around the site.

It was good to see that the extracted vehicle batteries were stored within a locked unit in a sealed container.

Tyre storage was adequate at the time of inspection.

Waste Returns

There is an error on your waste returns that needs to be addressed. Under the 'waste received' you are inputting the incorrect The European Waste Catalogue codes (EWC) Your current waste returns shows that it is coming from the dairy products industry - **02 05 99 (wastes not otherwise specified)**

There is also incorrect data for the 'waste removed'. The EWC you have inputted is from Chapter 4 wastes from the textile industry - **04 02 99 (wastes not otherwise specified)**

The use of EWC codes is a legal requirement of the Duty of Care (DoC) legislation across the UK.

The DoC requires that a waste holder (producer, carrier or disposer) takes all reasonable steps to ensure that waste is described in a way that permits its safe handling and management and that any transfer of waste is accompanied by a written description of the waste including The List of Wastes (LOW) Regulations code.

Please can you ensure that you are referring to the correct Chapters. You will need to use **Chapter 16** which details end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)

Consignment Notes

CAQ923 is your most recent hazardous waste producer code which expired in 11/08/2020. Please renew this as soon as possible. This can be done here:

<https://naturalresources.wales/permits-and-permissions/waste-permitting/register-or-renew-as-a-hazardous-waste-producer/?lang=en>

I have been unable to find movements for the removal of waste oil from the premises. You advised that Pure Clean Environmental in Avonmouth are contracted to remove oil from site. I have checked the English data and I am unable to find the information of those waste

movements. Please can you send consignment notes for this please.

Advisory Notes

Staff competency and training, I need you to produce for me a current Technically Competent certificate such as WAMITAB for the TCM for your site.

It was mentioned that the catalytic converters are not kept on site and taken off site due to the increased risk of theft. I strongly recommend that these remain on site and segregated appropriately due to the hazardous properties spent catalysts contain.

Please note that vehicles stored on uneven surfaces such as a skip bin may pose a risk of collapsing.

The area at the rear of the premises appears to be untidy and will need to be cleaned up. Please see Photo 1 below.

Photo 1 – This area will need tidying to ensure good segregation for dismantled components.



Photo 2 – Vehicle storage area



Photo 3 – chemical containers with various chemicals and fluids emptied during de-pollution process.



If you have any issues with this report, please contact Officer 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 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 only relating to the activity assessment
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.

What are suspended scores?

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 Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.