

Compliance Assessment Report CAR_NRW0037144

Permit being assessed: YP3992EN.

For: Heads Of The Valley Salvage Limited, held by Heads Of The Valley Salvage Limited
At: Dowlais Top, Merthyr Tydfil, CF48 2YG.

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

On 12/11/2020 between 10:30 and 12:00.

Parts of permit assessed: B3, B5, C1, C2, C4, D1, E3

NRW Lead Officer: Robert Andrews, accompanied by Craig Coleman, Loku Ranasinghe.

Report sent to: Colin Williams and Neil Williams, TCM and Director on 20/11/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	C3 Minor	1.1.1
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	Table S1.1
D1 - Incident Management - Site security	Assessed (A)	
E3 - Emissions - Surface water	C3 Minor	3.1.1

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

Total number of non-compliances recorded	Total non-compliance score
3	12

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
B3	Improve ground infrastructure to improve site drainage	30/04/2021
C2	Change and clean oil-interceptor	27/11/2020
C4	Remove the tyres from site or store on an impermeable surface with a sealed drainage system.	30/01/2021
E3	Remove oil from drainage ditch and oil interceptor (skim)	Already completed

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Environment Officer Robert Andrews, Waste Regulation Officer Loku Ranasinghe and Hazardous Waste Officer Craig Coleman visited Heads of the Valley Salvage LTD (Permit Number-YP3992EN) to conduct a routine site visit and hazardous waste check. The weather was damp and cold at the time of inspection and waste was not being accepted at the time of the visit.

They were met on site by company owners Neil and Colin Williams (TCM).

Thank you for taking the time to show us around the site and explain your waste activities. In general, the site appeared well managed, with low levels of oil contamination and good organisation of scrap vehicles. However, three breaches of the permit were recorded while on site, these breaches and additional advice and guidance are outlined below.

(B3) Site drainage engineering (Action only)

4.4 Hardcore storage areas and site roads will be kept in good condition to prevent pooling of rainwater and vegetation. They must be inspected every 6 months and their condition recorded using checklist in Appendix 1

The area adjacent to the drainage ditch has deteriorated and is uneven, consequently holding water. It also has vegetation overgrowth.



Action: Remediate the ground to improve site drainage and prevent pooling of surface water. This is an **Action Point** only and should be carried out by the **30/04/2020**.

(B5) Plant and equipment (Compliant at time of visit)

Overall, the plant and equipment were in good working order and organised efficiently

(C1) Staff competency/training (Compliant at time of visit)

1.4 Continued certificate of competency

The WAMITAB certificate was in date and available for inspection. Mr Williams also emailed this to us for our records.

(C2) Management system and operating procedures (Category 3 Breach)

Condition 1.1.1 states that the operator shall manage and operate the activities: a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances'.

Upon inspection the class one oil interceptor was working, however it was in urgent need of having the oil drained/skimmed. A large precipitation event or continued poor site operation would likely result in the overflowing of the interceptor with and washing more oil off the impermeable surface through the interceptor

and into the drainage ditch. Therefore there was a potential for a significant pollution event to occur which needed remediation.

This matter requires your attention as discussed on site to prevent any more significant oil reaching the drainage ditch and potential oil contamination off site. You were advised by the NRW officers attending that the drainage channel along the end of the impermeable surface area that led to the interceptor needed to be cleaned and cleared of any debris.

4.6 The interceptor and discharge quality will be inspected weekly and any accumulations of oil in the interceptor chambers will be removed and placed in the bunded oil tank. Records of the inspections, cleaning and maintenance will be recorded as set out in Appendix 1.

The interceptor should be seen as a last resort to prevent any off-site oil contamination and not as a collection point for all the oils spilt from poor waste treatment processes. The impermeable surface should still be kept as an oil free surface with the interceptor in place to catch any small amounts of residual oils and from spillages.





Action: Improve site management procedures/checks, clean the oil interceptor and filter by **27/11/2020**. This has been scored as a **Category 3 breach**.

(C4) Storage, handling, labelling and segregation (Category 3 Breach)

Table S1.1 All hazardous and non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage system that discharges to surface water via a Class 1 full retention interceptor (unless otherwise permitted).

There is a large pile of tyres stored on unmade ground on a bank to the south east of the site. Waste tyres must be stored on an impermeable surface with a sealed drainage system. Please ensure these are stored correctly or removed from site. These have been identified and breached on previous inspections.



Action: Remove and dispose of the tyres from site or store correctly on an impermeable surface with sealed drainage system by **30/01/2021**. This has been scored as a **Category 3 breach**.

(D1) Site security (Compliant at time of visit)

The infrastructure, parameter fence and security were well maintained and in good condition.

(E3) Surface Water (Category 3 Breach)

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1.

At the time of the visit there was a small amount of oil coming out of the interceptor and into the drainage ditch. The oil was minimal. However, the oil contamination could potentially discharge and pollute the Nant Carno. The root cause of this breach can be seen as a lack of effective management.



Action:clean up/skim oil from drainage channel by **13/11/2020**. This has been scored as a **Category 3 breach**.

We wish to thank Mr Colin and Neil Williams for their time and appreciate your co-operation and assistance in resolving the issues raised and look forward to continuing working with you in the future.

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Hazardous Waste Inspection:

Operator: Heads of the Valleys Salvage

Hazardous Waste Registration: CAF717

Heads of the Valleys Salvage does not operate solely as an End of Life Vehicle depollution centre. The focus of the business is split between waste metals from various outlets, such as construction and demolition wastes (metals only), rag and bone metal collection operations and members of the public who wish to weigh in scrap metals that they have accumulated at home. The site maintains a depollution bay for vehicles that are brought on to site. No parts are extracted from the vehicles for re-sale. Hazardous wastes that are derived as part of the depollution process, namely motor oils (13 02 XX) and break fluids (16 01 13*) are stored in a double bunded tank that is housed outside in the centre of the site. The oil containment unit is in good condition and houses all waste liquids prior to their removal from site by Oil Salvage Ltd (CBDU125540). Oil filters are removed and drained into a container which is then emptied into the oil

storage tank. The filters are barrelled and collected by Oil Salvage Ltd. Anti-freeze (16 01 04*) and radiator fluid (16 10 XX) are removed from the car during depollution and are stored in the single bunded containers until collection. Due to the low volume of depollution being undertaken currently these waste have not been collected for some time, but were most recently collected by Eco Oil (CBDU41782).

Batteries (16 06 XX) removed as part of the depollution process are stored in a bunded container that is resistant to acid corrosion. The container is clearly marked as a battery bin and is housed indoors. Batteries are currently collected by EcoBat (H J Enthoven, CBDU74463).

The catalytic converters (16 01 21*) are stored securely until they are disposed of. The most recent consignment of catalytic converters was sold to Sims Metals Ltd (CBDU91358). Although this can change depending on the price.

Waste tyres (16 01 03) that are generated as a result of the depollution process are collected by Welsh Tyre Recycling (CBDU014007).

All airbags (16 01 10*) are deployed prior to depollution due to the danger they possess.

Neil Williams is the site operator and holds a WAMITAB certification which is up to date and runs through to 2022.

Consignment notes were readily available on site for inspection and the waste transfer notes inspected were completed correctly.

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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.

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.