

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

Site	Pen Y Bont Scrapyard, Bala	Permit Ref	NP3094FV		
Operator/Permit holder	B M Rowlands, G A Rowlands, S Rowlands & W G Rowlands				
Regime	Waste Operations				
Date of assessment	13/09/2018	Time in	10:45	Out	11:30
Assessment type	Site Inspection				
Parts of the permit assessed	Containment of stored materials; Storage, handling, labelling, segregation; Reporting and notification				
Lead officer's name	White, Steven				
Accompanied by	Lombardi, Karl				
Recipient's name/position	Gary Rowlands/ Director	Date issued	10/10/2018		

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
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
------------------------------------	----------	---	----------

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

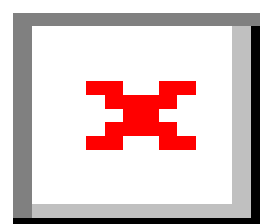
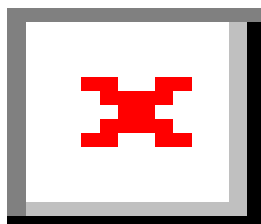
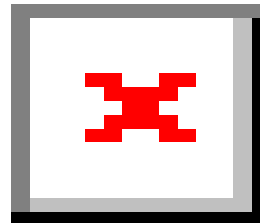
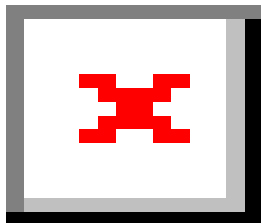
Section 2 – Compliance Assessment Report Detail

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

This was an unannounced inspection carried out by regulating officer Steven White accompanied by Karl Lombardi. Officers met with Gary Rowlands on site who accompanied throughout the visit.

As this was my first inspection of Pen Y Bont Scrapyard it would be difficult for me to prove how long some of the waste had been on site for, However there are wastes that look to have been stored on site for a lot longer than the permit allows, a review of previous CAR forms shows that some of the waste on site has been there for a long time and that this is not the first time concerns have been raised on this issue.



Wastes observed on site that have been stored for a considerable time

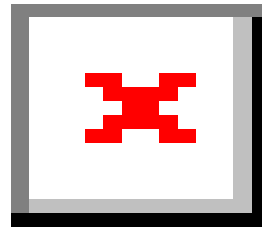
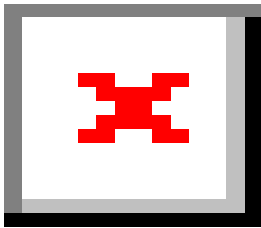
Permit Condition 2.1.1 authorises the operator to carry out the activities specified in schedule 2, table 2.1. Table 2.1 sets out the limits of the activities on site. These include:

- a maximum storage time of 7 days and 28 days for biodegradable and inert wastes respectively and
- a maximum storage time of 1 year prior to disposal or 3 years prior to recovery for waste associated with end-of-life vehicles (ELV)

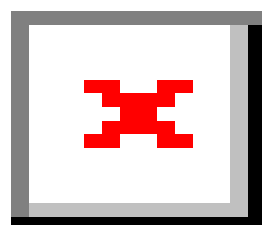
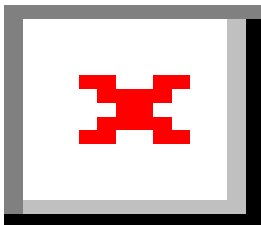
The Landfill Directive 1993/31/EC states that the maximum storage times for waste stored at a site are 1 year prior to disposal and 3 years prior to recovery; The metal waste on site that is not associated with ELV would therefore fall under these timeframes as well.

This was discussed with Gary Rowlands during the inspection who explained that the narrowness of the site in some locations can lead to problems with access to remove the waste, by reducing the amount of waste on site you will have better access to more of the site. As discussed, I will re-visit the site in approx. 6 months where I would hope to see a considerable reduction in the amount of waste on site – especially those wastes that have been on the yard for a long time. Gary Rowlands said that they would be looking to reduce the amount of waste on site. If there is not a reduction in waste volumes stored on site beyond its specified time by my next inspection (in approx. 6 months) I will review what actions are available to bring the site back into compliance.

The ELV depollution area was checked, due to the amount of waste on site in this part of the yard it was just accessible, this area drains to an interceptor; you must ensure that the site interceptor is checked and maintained regularly. There were a few old vehicles that were stored on permeable ground around the yard; you can only store fully depolluted vehicles on the hardstanding areas, all un-depolluted vehicles must be stored on the concreted, impermeable area.



Depollution area and old vehicle on permeable ground.



ELV collection area, and interceptor area

Waste returns were checked for 2017/18, whilst on site I mentioned that some discrepancies had been found – on double-checking the returns it was found that those for this period are in order.

Thank you for your time during the inspection, please find my contact details below.

Regards

Steven White

Environment Officer (Waste Regulation Team)

Direct dial 03000 653 913

Email: steven.white@naturalresourceswales.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033950**

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

Site	Pen Y Bont Scrapyard, Bala	Permit Ref	NP3094FV
Operator/Permit holder	B M Rowlands, G A Rowlands, S Rowlands & W G Rowlands	Date	13/09/2018

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			

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.