

Compliance Assessment Report

Report ID:
CAR_NRW0033858

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

Site	Tanygroes Metal Recycling	Permit Ref	SP3098FU		
Operator/Permit holder	Tanygroes Car Dismantlers Ltd				
Regime	Waste Operations				
Date of assessment	22/08/2018	Time in	15:05	Out	15:45
Assessment type	Site Inspection				
Parts of the permit assessed	Sub-criteria listed below				
Lead officer's name	Wilson, Alastair				
Accompanied by					
Recipient's name/position	Stuart Dunseath/ Director	Date issued	03/09/2018		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	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

This was a routine unannounced site inspection by Natural Resources Wales (NRW) officer Alastair Wilson (Environment Officer).

Throughout the inspection weather conditions were cool with light rain. No breaches were observed during the inspection.

Upon arrival the officer introduced themselves at the parts desk while contact was made with the site manager. The site manager Stuart Dunseath accompanied the officer during the inspection. Stuart is one of the two site Technical Competent Managers (TCM), the other being Bradley Williams. Both managers have continued competence certification until March 2020.

The site was operating, and customers were arriving to purchase parts.

A walk around of the permitted area was carried out. Hardstanding areas were in good condition. The impermeable surfaces (which are continuous from the public highway) were in good condition and the highway outside the site was clean. The drain in front of the depollution bay contained water (it was raining), other drains on site were clean and clear suggesting they are well maintained.



The waste fuel storage container is mounted above a bund, and pipework is contained within the bund. The officer and site manager discussed the "Control of Pollution (Oil Storage) (Wales) Regulations 2016" and the need to ensure that all tanks comply with the requirements by 15 March 2020.

Waste segregation and storage appeared to be good. Mr Dunseath said that there had been problems in getting tyres collected for recycling, and so there were more tyres on site than he would like, however current stock was within permitted limits. The requirements for storing tyres were discussed with a focus on fire prevention and mitigation. We discussed Fire Prevention and Mitigation Plans (FPMP) which are being introduced to permits, and I have included further information below. Some areas, such as around the tyre storage, could benefit from some general tidying.



A selection of depolluted vehicles were checked for fluids, all those checked were found to be free of liquids. Many of the vehicles stored for spares had engines/gearboxes removed completely.

Paperwork was inspected at the site reception. Waste transfer notes appeared to be in order. The site diary was up to date and contained useful information, records, problems, and when they were resolved.

During the site visit no permit breaches were observed. Thank you for your time on site. Should you have any questions or queries please do not hesitate to contact me.

Kind regards,

Alastair Wilson

Environment Officer – Natural Resources Wales

Further information:

Fire Prevention and Mitigation Plan (FPMP)

After a spate of serious fires on waste management sites Natural Resources are currently in the processing of varying environmental permits for sites dealing with combustible material to require them to have a Fire Prevention and Mitigation Plan (FPMP). All new relevant bespoke and standard rules permits will have a condition requiring a written FPMP as standard, whilst higher risk bespoke permits have already been varied to add this condition. At some point in the future your permit will have the condition requiring the site to have a written FPMP added, so I recommend that you start thinking about what this entails now. The written FPMP would need to be submitted to Natural Resources Wales and Mid & West Wales Fire and Rescue Service for assessment.

Guidance has been developed by NRW in conjunction with the Fire and Rescue Services within Wales. The current latest version of our Fire Prevention and Mitigation Plan guidance (version 2) is available on our website at: <https://naturalresources.wales/media/682159/eng-guidance-note-16-fire-prevention-mitigation-plan.pdf>

Control of Pollution (Oil Storage) (Wales) Regulations 2016

Known as the Oil storage regulations, or OSR Wales, these regulations require anyone in Wales who stores more than 200 litres of oil, to provide containment facilities for tanks, drums, Intermediate Bulk Containers (IBCs) and mobile bowers. This is to prevent oil escaping into the environment.

These regulations came into force on the 15 March 2016. New tanks installed after the Regulations come into force must comply with them. Existing tanks at significant risk must comply by 15 March 2018. Existing tanks not at significant risk have to comply with the requirements by 15 March 2020.

A guide is available on our website at: <https://naturalresources.wales/media/681287/osr-wales-faq-rt-pc-final-draft-v2-01022017.pdf>

EPR Compliance Assessment Report

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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.