

Our ref: PPN-00542

Date: 9 April 2021

Mr S Young
Grills Parts
139B High Street
Blaina
NP13 3AQ

Pre-application advice - PPN-00542

Dear Mr Young,

As discussed, here are the next steps you must consider before applying for an environmental permit with us.

Based on the information we have from your site and the types of activity you wish to carry out, there will need to be a permit in place to carry out the waste activities regarding End of Life vehicles. How to apply can be found at the link below:

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/do-you-need-to-apply-for-a-permit-or-register-an-exemption/?lang=en>

- If you can meet the requirements of a **Standard Rules permit (SRP)**, you could apply for an ELV permitted activity. You will need to satisfy the SRP sealed drainage requirements, distance from sensitive/protected receptors (i.e. rivers) and other conditions specific to the permit. Attached is an example of a potentially suitable SRP permit for an ELV operation

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/apply-for-a-new-standard-permit-for-waste-operations/?lang=en>

- If you cannot meet the conditions of a Standard Rules permit, then you will require a **bespoke permit** that is tailored to your activity:

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/apply-for-a-bespoke-permit-for-a-waste-operation/?lang=en>

Technically Competent Manager (TCM)

There are also requirements to have a Technically Competent person associated with the business when you hold an environmental permit. This requires a person with a relevant WAMITAB qualification to be present on site on a weekly basis. You can enrol on a course yourself to obtain the qualification or employ a consultant to visit the site to ensure compliance with your permit conditions.

Site conditions – Infrastructure

As it stands, it is unlikely that your current site will be able to comply with the Standard Rules requirements. In order to satisfy the basic conditions for a bespoke licence, you would need to modify the site to create **sealed drainage system**. This would involve installing an interceptor system to ensure contaminated run-off does not leave the site. This could be in the form of a sump or a chambered interceptor to capture various pollutants, such as oils.

We would need to see a detailed **drainage plan** of the yard to determine where any drains discharge to, for example, to surface water or foul sewer.

The hardstanding infrastructure around the back of the yard is currently insufficient to prevent hazardous liquids from soaking through the ground levels. Vehicles awaiting depollution can be stored in these areas, however you would need to create a lip or bund around the perimeter of the site to prevent run-off from leaving the site boundary. Partially depolluted vehicles could **not** be stored in this area for this reason.

The concrete infrastructure at the front of the yard is more appropriate, however still does not benefit from any sealed drainage; we would again expect this to be sealed off.

All depolluting/breaking of vehicles will have to be carried out under cover within the shelter on site. We have concerns whether there is not enough room within the shelter to carry out the depolluting and storage of shells/parts that you intend to carry out.

Surrender Fee

Should you wish to give up operating at any time, there is a fee for surrendering the permit - this is set at £2,593 for a low risk surrender. These are all costs that you must factor in when considering obtaining a permit.

NRW cannot inform parties which environmental permit to apply for as this must be a business decision. We can only advise which would be the most suitable to your proposed waste activity for you to make the final decision, as we are the regulators of the permits rather than the consultants.

Please note, that it is an offence to operate an ELV operation without an environmental permit. We consider that you have now been warned regarding this matter, and so if we substantiate that you are depolluting or dismantling vehicles without the appropriate permissions, we can prosecute under section 38 of the Environmental Permitting Regulations (England and Wales) 2016.

Summary

We have concerns that, with the site modifications required, you would be able to implement the necessary measures. We would ask that you consider the long-term implications of holding a permit before applying for one. We would also recommend employing an environmental consultant to assist you with the application should you wish to proceed.

If you require anything further please let us know.

Yours sincerely,

Jak Rose
Environment Officer