

Compliance Assessment Report CAR_NRW0038421

Permit being assessed: NP3094FV.

For: Pen Y Bont Scrapyard, Bala, held by B M Rowlands, G A Rowlands, S Rowlands & W G Rowlands

At: Penybont, Bala, Gwynedd, LL23 7PH.

Type of assessment carried out: Audit, Reason: Other.

On 10/06/2021 between 13:20 and 14:15.

Parts of permit assessed: See below

NRW Lead Officer: Donna Muirhead, accompanied by Daniel Grant.

Report sent to: Mr Rowlands, Owner on 24/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

End of Life Vehicle (ELV) Hazardous Waste Audit.

This was an announced visit carried out on Thursday 10 June 2021 by Natural Resources Wales officers Daniel Grant (Hazardous Waste Regulation Officer) and Donna Muirhead (Waste Regulation Officer).

The purpose of the visit was to undertake a Hazardous Waste Audit to assess for compliance against the Hazardous Waste Regulations (Wales) 2005. And a general site inspection.

Officers were accompanied around the site by Gary Rowlands (Site Operative).

Weather conditions throughout the audit was overcast but dry.

All ELV's accepted at the site are depolluted inside the site's depollution bay which benefits from an impermeable surface with sealed drainage (Figure 1).



Figure 1. Depollution bay where all ELV's are depolluted.

The motor oils (13 02 XX) that are produced as part of the depollution process at Pen y

Bont Scrapyard are stored in a double bunded container (Figure 2). Motor oils are removed from site by Oil Salvage Ltd who are a registered waste carrier (CBDU125540).



Figure 2. Double bunded tank used to store motor oils.

Overall, the waste oil containment unit was in good condition, however, during the audit it was noted that the outer most bund around the tank included various items. Please ensure that the bund is kept clear of any items or debris, otherwise the capacity of the bund is reduced which could ultimately increase the risk of pollution.

All other hazardous waste liquids derived from the depollution activity including brake fluids (16 01 13*) and antifreeze (16 01 04*) are stored in labelled storage drums (Figure 3). These are also removed from site by Oil Salvage Ltd.

Oil filters (16 01 07*) are removed, emptied of their contents and placed in a separate clearly labelled container which is located inside the depollution bay (Figure 3). Oil filters are removed from site by Oil Salvage Ltd.



Figure 3. Storage for oil filters and other various waste liquids clearly labelled.

Batteries (16 06 XX *) collected at site and those that are removed as part of the depollution process are stored in containers that are resistant to acid corrosion with a lid on top to prevent ingress of water (Figure 4). All batteries are removed from site and taken for disposal to S.Norton & Co Ltd, Liverpool, L20 8RQ who have an environmental permit (XP3492CL). It was apparent that some of the batteries had been stored in their containers for a long period of time. You should be reminded that your permit only allows a "Maximum storage time of 1 year prior to disposal or 3 years prior to recovery for wastes associated with end-of-life-vehicles.





Figure 4. Batteries stored in acid resistant containers with a lid.

Catalytic converters (16 01 21*) are also removed from ELV's, these are stored in a wheelie bin which is situated on an impermeable surface with sealed drainage (Figure 5). Catalytic converters are removed from site and taken for disposal to Sims recycling who have various permitted facilities in the UK.





Figure 5. Catalytic converters removed and stored in a wheelie bin which is located on an impermeable surface with sealed drainage.

All airbags (16 01 10*) are checked prior to depollution due to the danger they possess, any which remain armed are removed and discharged in a secure manner within the depollution bay.

Waste tyres (16 01 03) that are generated as a result of the activities on site are stored in various piles on the site's impermeable surface (Figure 6). These tyres are currently removed from site to Big Atom Ltd, Ellesmere Port, CH65 4EN who hold a relevant environmental permit (GB3601GL/S003)



Figure 6. Waste tyres stored on impermeable surface

Pen y Bont Scrapyard is currently registered as a hazardous waste producer (CAU946) until the 02/06/022.

Consignment notes were inspected during the site visit. The only issue that was identified was that the times were not recorded in Part C and D of the consignment notes. Please ensure these details are recorded from here on.

Overall, the site has good waste segregation with no apparent mixing between hazardous and non-hazardous waste types. However, improvements could be made regarding the cleanliness surrounding the access to the various hazardous waste storage containers.

It was noted during the audit that Consignee returns have never been submitted to Natural Resources Wales by Pen Y Bont Scrapyard. It was explained that if any commercial hazardous waste is accepted at the site including any farms then this movement must:

- Include a consignment note
- Be reported to us as a consignee return

Further information on how and when to complete a consignment note can be found using the following link:

<https://naturalresources.wales/guidance-and-advice/environmental-topics/waste-management/completing-hazardous-waste-consignment-notes/?lang=en>

Further details regarding consignee returns including detailed guidance and the submission requirements can be found here on our website:

<https://naturalresourceswales.gov.uk/guidance-and-advice/environmental-topics/waste-management/submit-your-hazardous-waste-return/?lang=en>

If you have any further questions about the contents of this audit report or any aspect of hazardous waste in general, please do not hesitate to contact me.

Yours sincerely

Daniel Grant

Hazardous Waste Regulation Officer

E-mail: daniel.grant@naturalresourceswales.gov.uk

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.