

Compliance Assessment Report CAR_NRW0038536

Permit being assessed: SP3098FU.

For: Tanygroes Metal Recycling, held by Tanygroes Car Dismantlers Ltd

At: Tanygroes, Cardigan, Ceredigion, SA43 2JP.

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

On 17/06/2021 between 10:30 and 11:30.

Parts of permit assessed: 2.1.1; 4.2

NRW Lead Officer: Kim Jones.

Report sent to: Stuart Dunseath, TCM on 26/07/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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

During the hazardous waste audit the following permit conditions were also assessed and found to be compliant.

The depollution process is carried out in a dedicated depollution bay. All hazardous waste oils that are derived as part of the depollution process are pumped to a large container that is bunded and is located on another part of the site away from the depollution bay.

The waste oil is removed from site by PureClean Environmental Ltd. A small amount is also being used by Lloyds Motors for their permitted small waste oil burner. Waste oil is an absolute hazardous waste and can only be removed from site in accordance with a hazardous waste consignment note. The site disposing of the oil would also need to complete quarterly hazardous waste returns. The hazardous waste officer will contact the garage to make them aware of the hazardous waste requirements.

Oil filters (160107*) are removed, crushed and all oil is drained into the oil containment unit. Upon emptying the contents of the oil filters, they are placed back into the same ELV they were originally removed from. Important to note, the process of returning oil filters back into the depolluted vehicle they were originally removed from must be fully met by a certain set of criteria's;

- A specialist piece of equipment must be used to crush the oil filters that has been designed for that specific purpose.
- The specialist piece of equipment must be used in accordance with the manufacturer's instructions.
- The process of crushing must be carried out by an operative who is suitably trained and competent to do so.
- The operative must assess each process individually to ascertain that all oil has been effectively removed from the oil filter.

If any of the above conditions have not been met, then it is not possible to confirm that all oil has been sufficiently removed from the oil filter. As a result of this, the oil filter cannot be placed back in the depolluted vehicle and must be classified as hazardous and removed from site separately as such.

The remaining liquid hazardous wastes that are derived as part of the depollution process, namely brake fluids (16 01 13*), anti-freeze (16 01 04*) and fuel are all stored in adequate containment units that are labelled, prior to their removal from site or re use.

Batteries (16 06 XX*) removed as part of the depollution process are stored in two containers that are resistant to acid corrosion and are in an adjacent garage. Batteries are currently disposed of by HJ Enthoven. The catalytic converters (16 01 21*) are stored in a container in a different building which is more secure until they are collected by Bayliss Recycling Ltd.

Waste tyres (16 01 03) that are generated as a result of the activities on site are stored in a large container on the far end of the yard and collected by Bri Chez Ltd.

All airbags (16 01 10*) are checked prior to depollution due to the danger they possess. If they can be removed safely for re-use they are stored in a secure metal container. Majority are found to be already deployed in the vehicle so remain in the vehicle.

All contaminated waste (15 02 02*) such as gloves, rags and spillkits is collected by LAS. The mixed municipal waste (20 03 01) is also collected by LAS, with cardboard and plastic

going to Norton.

The site has good waste segregation and labelling with no mixing between hazardous and non-hazardous waste types.

On entrance to site it was noted that a new sign had been erected with all the up to date information that had been requested from the site visit in 2019.

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.

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.