

Compliance Assessment Report CAR_NRW0038807

Permit being assessed: EP3997EX.

For: Cambrian Autoparts Northwest Limited, held by Cambrian Autospares Ltd

At: Glan-y-morfa Industrial Estate, Marsh Road, Rhyl, Denbighshire, LL18 2AD.

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

On 24/09/2021 between 13:30 and 14:05.

Parts of permit assessed: Site drainage engineering, Staff competency/training, materials acceptance, waste returns, Management systems and operating procedures, Storage, handling labelling and Segregation

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Sue Beach, owner on 11/10/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C1 - General Management - Staff competency/training	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?

Criteria	Action needed	Complete by
B3	Please ensure site interceptor is fully accessible at all times	25/10/2021
C4	Please ensure car batteries are stored appropriately. Please comply by the 15th of October 2021	15/10/2021
C2	Please update your working plan and submit to Natural Resources Wales for assessment.	08/11/2021

Action criteria codes are listed in the 'Important information' section below.

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

On Friday the 24th of September 2021 Boguslawa Pierzchala, new regulating officer for the site, conducted a routine site visit.

The site was last visited by Natural Resources Wales (NRW) on 29th of August 2017, the previous inspection is detailed in Compliance Assessment Report: CAR_NRW0032150

On arrival the officer was met by site manager Sue Beach.

The site was full at the time of inspection with approximately 250 cars stored in the yard. The yard is fully concreted and drains to an interceptor located close to the site entrance gate. It was noted that the interceptor was not readily accessible. You must ensure that the interceptor is kept clear of any obstructions, maintained regularly, and emptied when required. This must be recorded in the site diary.

The depollution area was checked and appeared in order. The vehicles are depolluted manually, approximately ten vehicles a week. Waste oil/fluids are stored in a large container located indoors next to the depollution area.

The indoor working area is currently being re-arranged to make space and maximise storage of the vehicle parts.

Engines are currently stored separately on shelves before being collected by Lelo Metals.

Only a small number of tyres is being kept indoors. The tyres are collected regularly.

Once depolluted the cars are sent to Delyn Metals for recycling.

During the inspection it was noted that car batteries were stored outdoors, on pallets and some on the ground. Please see photo below.



This has been brought to the owner's attention.

As per **condition 4.16** of your permit these wastes should only be stored in or on a suitable container to contain any leakage. They will be stored under cover or sheeted with tarpaulin or other waterproof materials to prevent rain washing. Batteries will only be stored upright and will not be drained on site.

Please ensure the batteries are stored appropriately. Please comply by the **15th of November 2021**.

During inspection the site Working Plan was discussed with the site owner.

Action: Please submit an updated working plan to Natural Resources Wales for assessment by the **8th of November 2021**.

Waste returns:

A review of annual waste return submissions 2020 for permit number EPR-EP3997EX has been completed. I am pleased to report on this occasion no issues were apparent.

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

Boguslaw

Boguslaw.Pierzchala@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 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.