

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

Site	Pengam Partmart	Permit Ref	EP3295FZ		
Operator/Permit holder	Ian Charles Jenkins				
Regime	Waste Operations				
Date of assessment	28/03/2019	Time in	10:30	Out	11:45
Assessment type	Site Inspection				
Parts of the permit assessed	Specified activities				
Lead officer's name	Palmer, Richard				
Accompanied by	Lee, Jonathan				
Recipient's name/position	Ian Jenkins/ Owner/Operator	Date issued	29/04/2019		

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	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

NRW Environment Officers Richard PALMER and Jon LEE attended Pengam Partmart on 28th March at 10:30AM to carry out routine inspection of permit **EPR-EP3295FZ**. The weather was fine but cloudy at the time of visit. We met with Site Owner/Operator Mr. Ian Jenkins and inspected the yard.

The site seemed to be well managed at the time of NRW site visit, and the following observations were recorded during the visit.

From the previous Compliance Assessment Report, it was apparent that 4 breaches had been scored, these areas of your operation were re-assessed on this visit to see if your operations had improved and your site was back operating in compliance with the Permit conditions.

C4: Storage, handling, labelling and segregation – Site operations improved – CCS Score - No breach

NRW prescribed requirement - Store batteries in a leak proof plastic container off the ground. To be enacted by 01/09/2018

NRW officers recorded that all batteries were being stored correctly at the time of inspection. The breach from the last CAR form can now be removed from the operators score. The Permit conditions and site EMS is being followed and all batteries are stored in a leak proof plastic container.

B4: Containment of stored materials – Specified by permit condition 3.1.3 – Site Operations Improved – CCS Score - No breach

NRW prescribed requirement - Remove liquids as indicated in your permit before storing

depolluted vehicles. To be enacted by 01/09/2018

NRW officers recorded that all and all oils, liquids and lubricants were being stored correctly at the time of inspection. The breach from the last CAR form can now be removed from the operators score. The Permit conditions and site EMS is being followed and all oils, liquids and lubricants are being removed and stored as required.

G4: Reporting and notifications – Specified by permit condition 4.2.2 – CCS Score - No breach

NRW prescribed requirement - Please refer to your permit on time frames in which to submit

your Waste Returns to NRW. To be enacted by 01/09/2018

As per the requirements prescribed in your permit regarding the time frames in which to submit your Waste Returns to NRW, Pengam Partmart successfully submitted the waste return to NRW on 23.01.2019. This brings the operator back into compliance and breach score can be removed.

A1: Specified by permit – Specified by permit condition 1.1.1 – CCS Score – No Breach

NRW prescribed requirement - Please refer to your Site Working Plan/Environment Management System on your responsibilities as an operator. To be enacted by 01/09/2018

NRW officers recorded that the overall standard of the site's operation had improved, since the previous NRW inspection. This was confirmed to the site officers in so far as that the battery storage and lubricant/anti-freeze depollution and storage operations had been improved to meet the permit requirements. Also, that the waste return submissions had been successfully completed and submitted on time. This evidenced to the NRW officers that the operator is running the site in a more responsible manner and hopefully can maintain and continue to improve the site operations.

General Observations

Previously there was a concerning number of damaged vehicles that were being held on the forecourt area of the site outside of the permitted area, at the time of the visit this wasn't the case and hopefully this continues as best practice. Ian Jenkins confirmed that the vehicles previously stored in this area are now being taken onto the permitted facility as soon as arriving on site.

The facilities and equipment in the depollution bay were in good condition, and a robust and thorough process was in place to remove any liquids from cars brought on to site.

NRW are currently in the process of assessing sites and their FPMP needs, as across Wales there have been several fires emanating from poor tyre storage practices. We are currently asking all sites to look at their tyre storage methods and update their Fire Prevention and Mitigation Plans. Please refer to your EMS regarding tyre storage which states '*Wheels & tyres removed from vehicles during the depollution*

process are assessed for suitability for reuse. Reusable tyres and wheels are separated & sold as spare parts. Waste wheels & tyres not suitable for reuse are separated using a wheel crusher, which is located to the rear of the depollution workshop. Waste tyres are stored in an orderly manner in the area immediately adjacent to the wheel crusher. Scrap tyres are currently removed from site by contractor on a fortnightly basis. Scrap steel or alloy wheels are stored pending collection in skips located in the same area.'

The current situation regarding the storage of Tyres was noted and it was discussed with Mr Jenkins that it was an area of concern for NRW and would need to be sorted at some point soon. Although no breach is scored in this case it was indicated that if the situation was not improved it could result in a breach in the future. It was suggested that a suitable storage area that meets the new Fire prevention requirements, regarding tyre stack size, proximity to other wastes and access to the stack for the fire service in the event of a fire, needs to be considered and the tyres stored as per these requirements.

Action: Review site plan and dedicate an area for tyre storage that meets the requirements as per the new NRW FPMP guidelines which are available online.

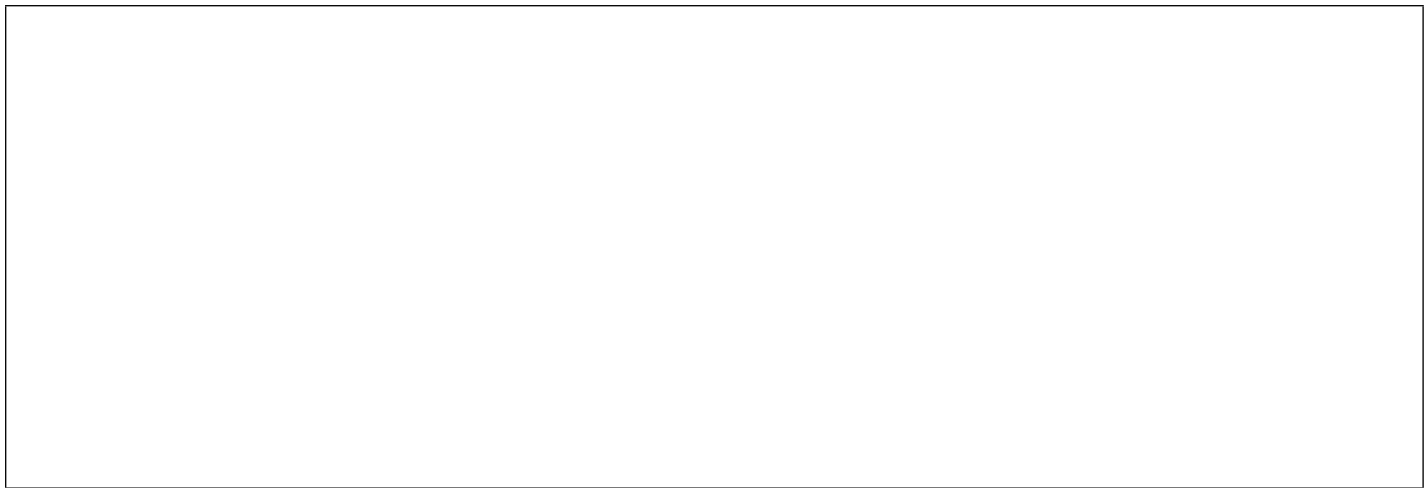
If you have any queries relating to your environmental permit or this form, please do not hesitate to contact me on the details below.

Richard Palmer

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Office Tel: 03000653799

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035047**

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

Site	Pengam Partmart	Permit Ref	EP3295FZ
Operator/Permit holder	Ian Charles Jenkins	Date	28/03/2019

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.