

Compliance Assessment Report

Report ID:
CAR_NRW0020574

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

Site	Gmh Vehicle Dismantlers	Permit Ref	VB3597TS		
Operator/Permit holder	Gmh Vehicle Recyclers Limited				
Regime	Waste Operations				
Date of assessment	11/05/2016	Time in	11:00	Out	11:40
Assessment type	Site Inspection				
Parts of the permit assessed	Storage, handling and infrastructure				
Lead officer's name	Powell, William				
Accompanied by	Jon Goldsworthy				
Recipient's name/position	Tahir Aziz/ Director	Date issued	16/05/2016		

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 - Infrastructure - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	X	
C3 - Infrastructure - Materials acceptance	A	
C4 - Infrastructure - Storage, handling labelling and Segregation	A	
E3 - Infrastructure - Surface water	A	
G2 - Infrastructure - Records of activity, site diary/journal/events	A	
G4 - Infrastructure - Reporting and notification to Natural Resources Wales	X	

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

Site inspection of GMH Vehicle Dismantlers with NRW officer Will Powell, and manager Jon Goldsworthy, and GMH Vehicle Dismantlers' staff Rhys Parry and Tahir Aziz. Weather was wet during visit, following heavy rainfall earlier in the morning.

Breaches

No breaches were recorded during this inspection – only advisory comments

Actions since last visit

Previous CAR form breached the storage of undepolluted ELVs (recently designated from insurance claim) on unmade ground. Much of the yard is now concreted, with suitable hardstanding elsewhere for depolluted vehicles, and no undepolluted vehicles were found stored on unmade ground.

Site inspection

This was a first site inspection. The car park out the front appeared to have some accident damaged vehicles. The car park was concreted though there was no drainage, so surface water would run off site. Officers were informed that the vehicles were being sold for repair, and are not classified as ELVs.

GMH Vehicle Dismantlers accept mostly insurance write-offs, though do take some ELVs from the public. GMH Vehicle Dismantlers specialise in parts and resale rather than scrap. Vehicles are brought onto site; ELVs, and insurance category A & B cards are brought straight to the area outside the depollution rigs, where all the drainage leads to the interceptor. Category C's & D's are taken to a separate concreted yard, however this does not link to the sealed drainage system. If a vehicle is found to be leaking, it should be stored on an area with sealed drainage, regardless of insurance category, to prevent pollution.

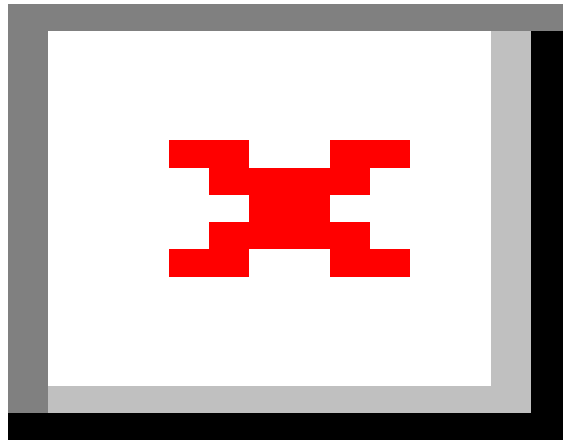
Vehicle parts were catalogued and stored within the shed at the back of the yard. Any engines that have been removed that are not suitable for reuse were placed in a skip, on the sealed drainage area.

Depolluted vehicles were stored on hard standing. All of these vehicles had the engines removed, which officers were informed is standard practice at GMH. The ELV shells are then stored on the hard standing for parts, particularly panels. No oil stains were observed in this area.

It was observed that there was a slight film of oil was seen on pools of water outside of the sealed drainage area. The area of concrete that leads to the interceptor has no divide between the areas of concrete that do not. It may be advisable to install a curb or slot drain (that links to the sealed system), to ensure there is no risk of oils or other pollutants entering the watercourse. Another area that may benefit from curbing would be around the edge where the category C & D vehicles – though this area is low risk. Oil was not observed

in the reens adjacent to the site.

The map below provides an outline of where activities occur onsite:



Infrastructure

The general concrete infrastructure onsite is good, and well maintained. No cracks in the concrete were observed.

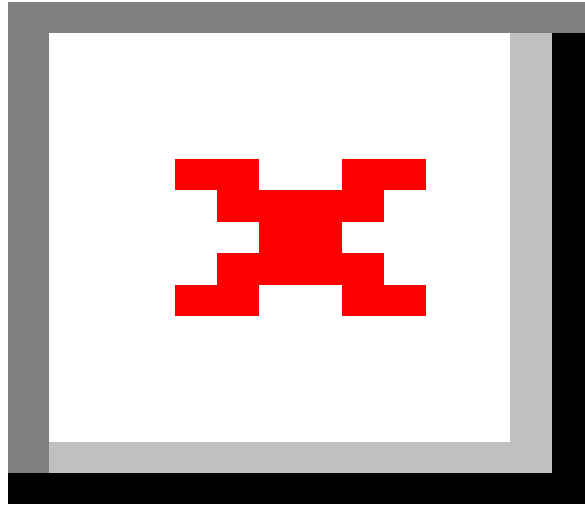
Oil and oil filters were stored in containers, in a covered bunded area. There were no visible cracks or issues with the infrastructure here.

The interceptor seemed well maintained, and staff reported it was checked on regularly.

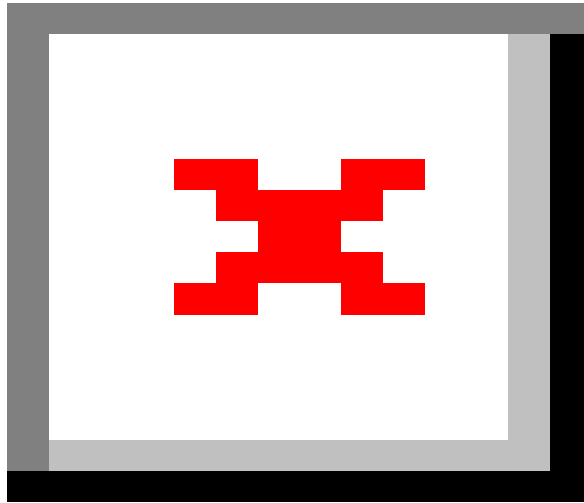
Records

Rhys Parry reported that GMH Vehicle Dismantlers have had issues with submitting their waste returns recently. Having checked NRW's systems though – GMH are up-to-date with these returns. GMH Vehicle Dismantlers are missing the consignee returns for Q3 & Q4 of 2015/16. Q1 of 2016/17 is also missing – however not all the data has been loaded onto our system for this quarter yet. Please ensure all returns are submitted, even if it is a null return by 31st July 16. If you are still having problems submitting returns, please contact your regulatory officer, or the customer contact centre – 0300 065 3000.

A consignment note for oil was seen during inspection, and looked to have been completed correctly. GMH Vehicle Dismantlers use wood chippings to spread on, prevent and clear up oil spills. There did not seem to be any consignment notes for this waste material. Please be aware that any waste contaminated with oil is likely to be hazardous, and would need to be consigned, and sent to a suitable authorised site for treatment.



Area where ELVs, and insurance category A & B vehicles are stored prior to depollution. This area could benefit from curbing or a slot drain that connects to the sealed drainage system, to prevent polluting run off.



Some oil film was seen in pools of water in areas not connected to the sealed drainage system. The concrete infrastructure onsite appeared in good condition.

EPR Compliance Assessment Report

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Operator/Permit holder	Gmh Vehicle Recyclers Limited	Date	11/05/2016

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			
B1	X	Consider installing curbing or slot drains to separate Cat A & B and ELV storage area from other parts of the yard.	30/09/2016
G4	X	Ensure any missing consignee returns are submitted by end of July 16	16/05/2016

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.