

Compliance Assessment Report

Report ID:
CAR_NRW0032630

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

Site	Tanygroes Metal Recycling	Permit Ref	SP3098FU		
Operator/Permit holder	Tanygroes Car Dismantlers Ltd				
Regime	Waste Operations				
Date of assessment	19/12/2017	Time in	10:35	Out	11:20
Assessment type	Site Inspection				
Parts of the permit assessed	Sub criteria listed below				
Lead officer's name	Wilson, Alastair				
Accompanied by	Markham, Heidi				
Recipient's name/position	Stuart Dunseath/ Director	Date issued	05/01/2018		

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	C3	1.2.2
C1 - General Management - Staff competency/training	A	
C3 - General Management - Materials acceptance	X	
C4 - General Management - Storage, handling labelling and Segregation	C3	5.4.1
D1 - Incident Management - Site security	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	C3	7.2.2

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	3	Total compliance score (see section 5 for scoring scheme)	12
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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

This was a routine unannounced site inspection by Natural Resources Wales (NRW) officers Alastair Wilson (Environment Officer), and Heidi Markham (Environment Officer).

Throughout the inspection weather conditions were cold with light drizzle.

Upon arrival the officers introduced themselves at the site reception. The site director Stuart Dunseath accompanied the officers during the inspection to describe site operations and facilities. Stuart is one of the two site Technical Competent Managers, and he informed us that either he, or the second TCM were always present on site when it is open. Stuart was reminded that his technical competency certificate will expire on 2nd March 2018.

The site was operating, and customers were arriving to purchase parts.

Paperwork was inspected at the site reception. Waste transfer notes were generally filled in correctly, although one or two had some missing information such as the time, please take care in making sure that all required information is included in these forms. The site diary generally contained useful information, issues, when they were resolved etc. however the most recent 3 weeks had no entries and some necessary information was not recorded. For example, Table 3.1 c) ii) in the permit states that "Inspections and emptying of sealed sumps shall be recorded in the site diary", and point i) of the same table says that "sealed sumps shall be inspected no less frequently than daily" however sump inspections were not noted in the diary.

CAR sub criteria G2, Permit condition 7.2.2, Compliance Classification Scheme Category 3 breach.

As specified within condition 7.2.2 of the site permit each record (in the site diary) shall be completed within 24 hours of the relevant event. The incomplete diary receives a Compliance Classification Scheme category 3 breach which has been recorded against condition 7.2.2 of the site permit.

A thorough walk around of the permitted area was carried out. Hardstanding areas appeared suitable, there was a thin layer of surface mud which was unsurprising in the wet conditions and the passage of vehicles. Despite this there was no rutting, and inspected areas remained free of standing water. The impermeable surfaces (which are continuous from the public highway) were in good condition and no mud went out onto the highway. Drainage on the impermeable surfaces appeared to be clear.

Waste oil storage tanks were mounted above a large bund. The tanks appeared to be quite old and corroded. There was approximately 15cm of rainwater within the bund, and a small amount of black oil and scum floating on the surface. It would be advisable to remove the water regularly so as not to reduce its capacity significantly.

Waste segregation and storage appeared to be good apart from some lead acid batteries that we discussed. Some areas could benefit with some general tidying, such as the area of waste/reusable tyres, however you did mention that the employee who carries out tyre work was not there on the day of inspection.

CAR sub criteria C4, Permit condition 5.4.1, Compliance Classification Scheme Category 3 breach.

As specified within condition 5.4.1 of the site permit residual wastes shall only be handled and stored on the site in accordance with the standards specified in Table 5.4 below and table 4.2 of the working plan. Lead acid batteries were on the ground outside between some ELV's and not in an appropriate container. A Compliance Classification Scheme category 3 breach has been recorded against condition 5.4.1 of the site permit. During the inspection you gave the reason for this breach as being due to the batteries not all being picked up by the vehicle collecting them.

Depolluted vehicles were stored on permeable hardstanding, many of which had their engines/gearbox removed. A selection of depolluted vehicles were checked for fluids, the first of which was found to contain a full tank of screenwash and brake fluid, although engine oil had been removed. It was not practical to check transmission oil and other fluids. A further 4 vehicles were checked and these all appeared to have been depolluted correctly.

CAR sub criteria B4, Permit condition 1.2.2, Compliance Classification Scheme Category 3 breach.

As specified within condition 1.2.2 of the site permit storage and treatment of waste motor vehicles shall meet the requirements of Article 6(1) and (3) of the End-of-Life Vehicles Directive and section 4.4.3 of the working plan. A Compliance Classification Scheme category 3 breach has been recorded against condition 1.2.2 of the site permit. During the inspection you said you would get this vehicle back into the depollution bay to be processed properly.

Thank you for your time on site. Should you have any questions or queries please do not hesitate to contact me.

Kind regards,

Alastair Wilson

Environment Officer – Natural Resources Wales

EPR Compliance Assessment Report

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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			
C4	C3	Store lead acid batteries in appropriate storage	31/01/2018
C3	X	Ensure all details are filled in correctly in waste transfer notes	31/01/2018
G2	C3	Fill in site diary within 24hrs of events, fill in required information e.g. daily oil separator inspections.	31/01/2018
B4	C3	Complete full depollution of vehicle and ensure all vehicles are depolluted fully before being moved to permeable hardstanding	31/01/2018

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.