

Compliance Assessment Report CAR_NRW0045846

Permit being assessed: LB3933AE.

For: Thomas Skip And Plant Hire Ltd, held by Thomas Skip and Plant Hire Limited
At: Unit 5b, Griffiths Crossing Industrial Estate, Caernarfon, Gwynedd, LL55 1TS.

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

On 22/10/2024 between 10:00 and 12:30.

Parts of permit assessed: As below.

NRW Lead Officer: Leon Williams.

Report sent to: Natasha Thomas , Company Director on 18/12/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W2A - Waste - Operations - Permitted activities	C3 Minor	Table 2.1
W2D - Waste - Operations - The site	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
1	4

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
W1A	Update draft EMS with recommendations outlined below and provide NRW with copy of document.	28/02/2025
W2A	Permit variation.	28/02/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

A routine site inspection was conducted at Thomas Skip And Plant Hire Ltd, Caernarfon on the 22 October 2024 by Natural Resources Wales (NRW) Senior Waste Regulation Officer Leon Williams.

Present on site were company Directors Iestyn Thomas and Natasha Thomas as well as consultant Marco Muia of Oaktree Environmental Limited.

W2A - Permitted activities

Table 2.1 activities - Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.

Environmental permit LB3933AE allows the manual treatment of wastes only.

At present the site uses a 360 excavator with riddle bucket to screen inert wastes and waste soils.

This is a mechanical treatment activity which is not currently permitted by condition 2.1 of the site's environmental permit.

Discussions were held on site regarding this matter and the company intend to apply for a permit variation to rectify this non-compliance.

A CCS Category 3 score has been issued in response to this non-compliance.

NRW note that the company have registered S2 and T4 waste exemptions (NRW-WME102907) to permit the storage of specific waste types as well as baling, sorting and shredding activities.

Please be aware that the use of waste exemptions at and adjacent to permitted waste sites is due to be prohibited by the upcoming review of waste exemptions.

All additional amendments to the company's permitted operations will then need to be dealt with by permit variation. Please therefore consider any additional amendments required to the site permit and submit with the application for mechanical treatment.

W1A General Management

Permit Condition 1.1.1 - "The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints;"

NRW's previous compliance assessment report CAR_NRW0044288 required the company to update the site's Environmental Management System (EMS) to address concerns

regarding waste classification, sampling and emergency procedures.

A new EMS has been produced by Oaktree Environmental Limited and a draft version of the document was received on the 21 October 2024.

Updated waste acceptance and classification procedures are set out in section 3.5. Updated waste sampling procedures are outlined in section 3.12

We have reviewed the draft EMS and wish to record the following comments:

- Section 1.4.3 of the EMS details mechanical waste treatment activities. This will require amendment to manual treatment until the site permit is varied to include mechanical treatment activities.
- Section 1.6.1 makes reference to a site plan document reference TSPH/3292/03. A copy of this site plan is not included in the draft EMS. Please provide NRW with a copy.
- Section 3.9.2 makes reference to screening and crushing activities. The site is not permitted to mechanically screen or crush waste. Please amend.
- Section 3.12 references the use of a trommel to sort mixed waste streams. The site sorts the majority of wastes manually and therefore this section will need to be amended to reflect current operating techniques.

Waste sampling plan

You must provide evidence that the sampling you are undertaking is sufficient based on the volume of waste produced and the variability of initial characterisation sampling.

Please further expand the methodologies outlined in the sampling plan to include information regarding:

- What type of sampling containers are used by the company.
- The volume of samples taken by the company.
- Where samples are stored.
- How are samples transported for analysis.
- Who in the company takes the samples and their relevant training.
- Are the samples singular or composite.
- How many samples are taken on each sample run.

- Please explain how testing frequencies in Section 3.12.7 have been decided in accordance with Appendix D of WM3.
- Please further clarify how sampling analysis for Chapter 19 waste streams will be interpreted by the company and how these assessments are to be documented.
- Please outline how the company will comply with the Landfill Disposals Tax (Wales) Act of 2017 and Landfill Tax (Qualifying Material) Order 2011 when disposing of waste to landfill.

Waste storage procedures

The draft EMS does not contain specific waste storage procedures. These are specified in the current "How to comply with your environmental permit" guidance:

[How to comply with your environmental permit](#)

If you store waste pending its disposal or recovery elsewhere, your management system

must include:

- *"storage times and procedures to ensure that these times are not exceeded*
- *maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded*
- *maximum storage heights to prevent or minimise the emission of dust, litter and throughput management*
- *procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures".*

ACTION: Please amend the draft EMS as outlined above and provide NRW with a copy of the new document by the 28 February 2025.

W2D The Site

Permit Condition 2.4.1 - The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

During our previous site inspection we observed that the inert waste and soil stockpile had overtopped the site boundary and wastes had escaped down the slope towards the adjacent watercourse.

The wastes that had escaped were promptly moved back into the site and a new retaining wall has been constructed with concrete barrier blocks.



Diolch yn fawr am eich cydweithrediad.

Leon Williams

Uwch Swyddog Rheoleiddio Gwastraff / Senior Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales

[Siaradwr Cymraeg](#)

www.cyfoethnaturiol.cymru / www.naturalresources.wales

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.