

Compliance Assessment Report CAR_NRW0045791

Permit being assessed: JP3694FP.

For: S And K Matthews Skip Hire, held by S And K Matthews Skip Hire

At: Minera, Wrexham, Clwyd, LL11 3YQ.

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

On 05/12/2024 between 14:00 and 14:25.

Parts of permit assessed: 1.1.1

NRW Lead Officer: Boguslawa Pierzchala, accompanied by Amy Henderson.

Report sent to: Neil Matthews, Owner on 20/12/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W4B - Waste - Information - Reporting	C4 No impact	6.2.2
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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
W4B	Please revise and re submit the waste returns for Q1, Q2, Q3 2024	17/01/2025
W1A	Please provide your current WAMIRAB certificate	17/01/2025
W4B	Please provide duty of care documents for the removal of the ELV seen on site on the 5th of December 2024	17/01/2025

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.

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 29th of November 2024 NRW waste regulation officer attended at S and K Mathews skip hire.

The site owner, Neil Mathews, was present , but stated he could not accommodate a site inspection at the time, due to heavy workload.

On Thursday the 5th of December 2024 waste regulation officers re-attended the site and carried a site inspection at S and K Mathews skip hire.

The weather was wet and windy.

The officers were met by the site owner who accompanied the officers throughout the inspection.

The site appeared in reasonable order with waste segregated and mostly contained within appropriate bays/containers.

The officers noted low volumes of waste on site. Mr Mathews stated that the waste activities are limited. Waste accepted on site is mainly generated through his groundwork business.

Officers noted a single, end-of-life vehicle (ELV) on site. Please see the below photo.



ELV on site

Mr Mathews stated that the ELV belongs to a family member who needed a temporary storage for it.

The ELV was un-depolluted and was stored on a skip placed on hardstanding ground.

There were no mitigation measures to stop the potential pollution going into the ground, should the vehicle leak. Mr Mathews stated that the vehicle would be removed by the end of the week

Action: Please provide duty of care documents for the removal of the ELV. Please comply by the

17th January 2025

Waste Returns

Permit condition **6.2.2.** states: A summary of the waste types and quantities accepted and removed from the site shall be made for each quarter of the financial year and shall be submitted to the Agency within 1 month following the end of that quarter. The summary record shall be in the format detailed in Appendix B or otherwise subsequently agreed with the Agency in writing.

A review of the waste returns submissions **Q1-Q3 2024** for permit EPR-JP364FP has been completed.

The waste returns show two waste codes accepted on site, namely 191212 and 170904. Both codes are not listed as permitted waste on the site's permit.

This issue was discussed with Mr Mathews who stated it was a genuine mistake. He stated he should have put the 191212 as the outgoing waste.

The waste present on site seemed compliant with the codes listed on the permit.

Therefore a **C4 score** was assign to this permit breach

Action: Please review and re-submit the waste returns (Q1 to Q3 2024) by the **17th of January 2024**

WAMITAB certificate.

NRW does not currently have an up-to- date WAMITAB certificate for Mr Mathews.

Action: Please provide a copy of your WAMITAB certificate for our records. Please comply by the **17th of January 2024.**

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

Kind regards,

Boguslawa Pierzchala Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.pierzchala@naturalresourceswales.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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.