

Compliance Assessment Report CAR_NRW0045995

Permit number	QP3098FL	Operator name	Resources Management U.K Limited
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Site name	Withyhedge Waste Transfer Station
Site address	Withyhedge MRF, Bowling Farm, Rudbaxton, Haverfordwest, Pembrokeshire, SA62 4DB.
Type of assessment	Audit

Date of assessment	06/01/2025	Time in	10:30	Time out	14:00
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Parts of permit assessed	Waste Acceptance
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NRW Lead officer	Rhodri Morgan	Accompanied by	Erin Smyth Evans
Report sent to – Name and position	Phil Ridley – Director	Date	30/01/2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
(W1A) General management	Assessed (A)	1.1.1
(W2C) Operating techniques	Assessed (A)	2.3.1 (a)
(W2E) Waste acceptance	Assessed (A)	2.3.2 (b)
(W3C) Odour	Assessed (A)	3.2.1

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

Total number of non-compliances recorded	Total non-compliance score
0	0

2. What action is required?

Compliance Criteria	Action needed	Complete by
W1A W2C W2E	Prior to any waste loads being received on site, the information required to comply with the site's waste acceptance procedures must be submitted by the waste producer to Resources Management U.K Limited (RML) for assessment.	Immediately

Compliance Criteria	Action needed	Complete by
	Only following the operator’s assessment that the waste batch and supporting information (e.g. Basic Characterisation etc.) conform to the requirements of the EPR permit, can the waste be accepted on site.	
W2E	Liaise with the waste producer to ensure the Duty of Care documents are completed correctly.	Immediately

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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

Resources Management (UK) Limited (RML) operates Withyhedge Waste Transfer Station (WTS) under the provisions of an EPR Permit (QP3098FL). The WTS is the location where waste destined for the landfill are first received and checked ahead of disposal within Withyhedge Landfill (MP3330WP).

As the WTS is not permitted to treat wastes (other than bulking up for onwards transport), wastes are transported directly onto the landfill for disposal. The Materials Recycling Facility (MRF) which is also listed within the permit is not operational.

Introduction

Waste disposal activities at Withyhedge Landfill (MP3330WP) were suspended by RML between May 2024 and January 2025. This decision was made by RML in response to the uncontrolled release of landfill gas and malodourous emissions from Cell 8 (Phase 2). As a result of this decision, no wastes have been accepted within the WTS since May 2024.

Following a review of waste acceptance procedures and various onsite improvements, RML recommenced waste disposal activities on the 6th January 2025.

A site visit was arranged on the 6th January 2025 to conduct a waste acceptance audit. Whilst onsite we also undertook an inspection of Withyhedge landfill (MP3330WP). The results of the landfill inspection are contained within a separate CAR¹.

NRW Officers were accompanied throughout the site inspection by the Site Manager, Technically Competent Manager (TCM) and Health and Safety Manager.

¹ CAR_NRW0045988

Waste Acceptance Audit

Background

RML submitted amended waste acceptance procedures for the WTS and waste disposal activities within Cell 9 of Withyhedge Landfill (MP3330WP). These procedures were reviewed and accepted by NRW (see CAR_NRW0045960). The revised waste acceptance procedures are now part of the permit; incorporated under Operating Techniques (Permit Condition 2.3.1).

The revised waste acceptance procedure (RML - Waste Acceptance [NSSL ARL Only] - v1.3) were used as a reference during the audit.

Audit Findings

Waste Acceptance

NRW Officers observed a number of vehicles being unloaded within the WTS and being subjected to Level 3 on-site Verification. On each occasion the vehicle was witnessed proceeding over the weighbridge with the driver exiting the vehicle and entering the weighbridge office.

The weighbridge operative was observed confirming the contents of several loads with the vehicle drivers before allowing each vehicle onto Site. It appears that the relevant transfer documentation was checked and verified. Following this initial identification/ verification process the vehicle was directed to unload within a designated bay at the WTS.

The wastes we observed being unloaded within the WTS appeared to be shredded general waste, which is listed within the EPR Permit.

NRW officers witnessed the TCM and Site Manager inspect each of the loads as part of the Level 3 on-site Verification. A discussion was held with site personnel who provided a competent overview of the revised waste acceptance procedures.

NRW officers completed an independent visual inspection of the waste being deposited within the WTS's bays – for eventual disposal at the landfill. No evidence of any banned or prohibited wastes were observed in any of the wastes we inspected during this visit. A slight waste odour was noted (characteristic smell with newer wastes) but this quickly dispersed.

Following RML's Level 3 on-site verification, the waste was observed being loaded into several trailers for onward deposition to the Withyhedge landfill (MP3330WP) for disposal in Cell 9.

All wastes accepted on the 6th January 2025 were initially accepted under the WTS permit before being transferred to the landfill (MP3330WP).

Document Review

Following a visual inspection of some of the waste loads being accepted within the WTS, we then proceeded to review the waste acceptance documentation which was provided by RML upon request.

The following documents were provided by RML:

1. Basic Characterisation (BC) Form
2. Level 1 Basic Characterisation Report
3. Annual Duty of Care (DOC) Form

1. Basic Characterisation Form

Following an initial review of the BC form it was evident that the description of the waste – “MRF Stone – Containing Inert Bricks/Ceramics” was not an accurate description of what NRW Officers had observed being accepted at the Site. The Site manager was queried on this and agreed.

Following a discussion with the Site manager it was determined that the incorrect BC form had been provided by the waste producer. Without the correct BC form, RML cannot assess whether the waste received at the site comply with the requirements of the permit.

Note – Non-compliances associated with the incorrect BC form have been documented within a separate CAR covering the Withyhedge Landfill permit (MP3330WP).

Following a short discussion with the waste producer, RML provided a second BC form. This appeared to have the correct waste description – Non-Hazardous General Waste – which matched what NRW Officers observed being accepted at the Site.

No further discrepancies or permit non-compliances were noted within the BC Form. The form appeared to contain a suitable level of detail to correctly characterise the waste.

The document confirmed that a WM3 Assessment had been undertaken which is required for certain wastes classified as 19 12 12. These results of the WM3 Assessment were attached within the second document “Level 1 Basic Characterisation Report”.

The type of waste was listed as “Non-Hazardous” which is an appropriate classification for 19 12 12 (following a WM3 assessment). The description of the appearance of the waste – “Processed Municipal & Commercial waste – containing non-recyclable materials Mixed Colours, Solid” – is appropriate based on the observations of NRW Officers.

2. Level 1 Basic Characterisation Report

This document acted as the WM3 Assessment for the waste stream which was prepared by the waste producer. While a full review of the 342 page document was not undertaken, the methodology of the document appears acceptable.

The sample results and subsequent HazWasteOnline (HWOL) Reviews report the waste to be non-hazardous and suitable for acceptance at the WTS.

3. Annual Duty of Care Form

A copy of the duty of care note used by the carrier to deliver this waste was also inspected and the following observations are made:

- The permit number of the waste producer is incorrect.
- The expiry date (25/04/2025) of the waste carriers registration is not listed.

RML must improve liaison with the waste producer to ensure the DOC forms are completed correctly.

Whilst this audit has only examined in detail the one waste type being delivered to site during the inspection, (General Waste – 19 12 12), RML must ensure that all future wastes accepted at the facility conform to the required waste acceptance procedures. Waste that does not must be rejected.

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated Site that cannot foreseeably have any impact on the environment, people and/or property

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 Waste compliance criteria (used in section 1 and 2):

Management

- W1A - General management
- W1B - Energy Efficiency
- W1C - Avoidance, recovery and disposal of wastes produced by the activities

Operations

- W2A - Permitted activities
- W2B - Waste recovery plan
- W2C - Operating techniques
- W2D - The site
- W2E - Waste acceptance
- W2F - Technical requirements
- W2G - Improvement programme
- W2H - Pre-operational conditions

Emission and Monitoring

- W3A - Emissions to water, air or land
- W3B - Emissions of substances not controlled by emission limits
- W3C - Odour
- W3D - Noise and vibration
- W3E - Monitoring
- W3F - Pests
- W3G - Fire

Information

- W4A - Records
- W4B - Reporting
- W4C - Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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.