

Compliance Assessment Report CAR_NRW0046012

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	Site Inspection

Date of assessment	16/01/2025	Time in	11:30	Time out	14:30
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Parts of permit assessed	Site Inspection
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NRW Lead officer	Rhodri Morgan	Accompanied by	Erin Smyth Evans
Report sent to – Name and position	Phil Ridley – Director	Date	31/01/2025

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

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.

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

Resources Management (UK) Limited (RML) operates Withyhedge Waste Transfer Station (WTS) under the provisions of an EPR Permit (QP3098FL). The WTS accepts waste 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 listed within the permit is not currently operational.

Introduction

An unannounced site inspection was conducted on the 16th January 2025 to assess general compliance with permit conditions. A site inspection of the of the adjacent Withyhedge Landfill (MP3330WP) was also completed¹.

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

Site Observations

Odour Assessment

Prior to the Site inspection, an odour assessment was undertaken by NRW officers at several points within the surrounding community; including locations within Spittal, Poyston Cross and Rudbaxton.

No landfill gas or waste odours were detected. Agricultural odours were noted at several monitoring points.

The findings of the odour assessment were shared with the Operator.

¹ CAR_NRW0046007

Waste Transfer Station (WTS)

On arrival the Operator confirmed that sixteen loads of waste had been accepted that morning including fourteen loads of non-hazardous shredded general waste (19 12 12) and two loads of Qualifying Fines (19 12 12). These waste streams are listed on the EPR permit for the WTS and landfill (MP3330WP).

NRW Officers noted several samples awaiting collection within the site office. On inspection these were discovered to have been obtained as part of the Level 3 on-site verification process. The purpose of the sampling is to independently verify that the Level 1 Basic Characterisation and Level 2 Batch Testing results received from the waste producer.

The number of samples observed was consistent with the testing schedule listed within the waste acceptance procedures.

NRW Officers inspected a selection of the wastes within the WTS. No evidence of any banned or prohibited wastes were observed during the inspection. RML operatives were observed inspecting the wastes as part of the Level 3 on-site verification process.

A Gazomat methane detector was used to check several of the waste loads; no elevated readings were noted. No malodorous emissions were detected during the inspection of the WTS.

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.