

## Compliance Assessment Report CAR\_NRW0046117

**Permit being assessed:** QP3098FL.

For: Withyhedge Material Recycling Facility, held by Resources Management U K Ltd  
At: Withyhedge MRF, Bowling Farm, Rudbaxron, Haverfordwest, Pembrokeshire, SA62 4DB.

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

On 13/01/2025 between 12:06 and 13:33.

Parts of permit assessed: See CAR Summary

**NRW Lead Officer:** Elliot Jones, accompanied by Benjamin Taylor.

**Report sent to:** Phil Ridley , Director on 03/02/2025.

### 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	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	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
0	0

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?

No action required.

### 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

### Withyhedge Waste Transfer Station QP3098FL

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 also listed within the permit is not operational.

### Purpose of Compliance Assessment Report

An unannounced inspection of the WTS was performed by NRW officers on the 13<sup>th</sup> January 2025. Operator commenced waste acceptance at WTS on the 6<sup>th</sup> January 2025 following an extended period of voluntary closure by the operator (May 2024 – January 2025)

Inspection included observation of the following:

- Incoming waste at the Waste Transfer Station (WTS) operating under environmental permit QP3098FL.

### Waste Transfer Station Observations

NRW officers observed a number of vehicles (5 Atlantic Recycling and 2 Neals Soils Trucks) being unloaded within the WTS and being subjected to Level 3 Testing (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 wastes deposited at WTS by Atlantic Recycling trucks was shredded general waste (19 12 12). Waste deposited at the WTS by the Neals Soils trucks was 19 12 12 Qualifying fines. These waste streams are listed on the EPR permit for the WTS and landfill (MP3330WP)

NRW officers witnessed the Technically Competent Manager (TCM) and plant operator inspecting each of the arriving loads as part of the Level 3\* Testing (On-site Verification)

Whilst visually inspecting the waste loads NRW officers did not observe any banned or prohibited waste types in the waste mass. Officers did detect a mild fresh waste like odour, despite this officer did not perceive this odour to be offensive. The odour quickly dissipated.

Following the Level 3 Testing the waste was observed being loaded into several trailers for onward travel to the landfill for disposal.

All wastes delivered to the site on the 13<sup>th</sup> January 2025 were initially accepted under the WTS permit (QP3098FL) before being transported to the active tip cell of the landfill.

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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](mailto: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](mailto: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.