

Compliance Assessment Report CAR_NRW0046289

Permit being assessed: EB3893HR.

For: Cox Skip And Waste Management Ltd, **held by:** Owain Thomas

At: Village Farm Road, Village Farm Industrial, Pyle, Bridgend, CF33 6BP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/02/2025 between 10:50 and 11:20.

Parts of permit assessed: W1A, W4C.

NRW Lead Officer: Daniel Hopkin, accompanied by Amy Bailey.

Report sent to: Site Manager , Site Manager , on 14/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	2.3.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W4C - Waste - Information - Notification	C3 Minor	4.3.1(a)

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Please remove and quarantine the waste that included plasterboard within the inert stockpile. Please send photographs to Natural Resources Wales of this material quarantined and stored in line with Table 2.3. Please provide this by 1st March 2025. Please also provide an action plan detailing how you plan	01/03/2025

Criteria	Action needed	Complete by
	to deal with the existing stockpile that is on site, including a time schedule and how you plan to manage future waste acceptance of inert material. Please provide this via email by 1st March 2025. Please ensure the hardstanding area is able to percolate rainwater effectively and remain permeable, undertaking any necessary maintenance. Please send photos once complete to Natural Resources Wales, please do so by 1st March 2025, or alternatively propose a date for completion of the required maintenance, by 1st March 2025.	
W1A	Please ensure operations on site are performed in line with the procedures contained within the sites Environmental Management System, which should also be written in line with How to comply with your Environmental Management System guidance.	01/03/2025
W4C	Please ensure compliance with condition 4.3.1	01/03/2025

Compliance 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

Industry and Waste Regulation Officer Amy Bailey and apprentice Daniel Hopkin attended the permitted facility of Cox Skips and Waste Management, 80 Village Farm Road, Pyle, CF33 6BN on the 7th February 2025 to undertake an unannounced inspection, arriving at approximately 10:50am. During the inspection, the weather remained fine and dry.

Cox Skip and Waste Management Ltd hold a Standard Rules permit, standard rules SR2008 No1 are conditions of this permit. Environmental permit reference EPR-EB3893HR issued 17th December 2014, allows the operator to operate a household, commercial and industrial waste transfer station, at the above specified location, with treatment activities consisting only of manual sorting or manual separation of waste into different components for disposal (no more than 50 tonnes per day) or recovery. These rules do not allow waste treatment activities such as screening or crushing and hazardous waste is not permitted.

The purpose of the site inspection was to assess compliance with the conditions of the sites environmental permit.

On arrival, we were met by the site Operator and Technically Competent Manager.

Site improvements

Following the significant improvements made by the Operator to the drainage and site infrastructure, the site overall is looking tidier and is more organised and the new drainage system connected to the impermeable surface appears to be working well.

General Management

In relation to the storage and handling of waste on site, officers observed material including plasterboard has been added to the existing stockpile of inert material on site, thereby mixing waste and contaminating the existing material. Only specified wastes shall be stored and treated on hardstanding or an impermeable surface with sealed drainage system'.

Permit condition 2.3.1 states - 'The activities shall be operated using the techniques and, in the manner, described in Table 2.3 below.'

Table 2.3 states:

Table 2.3 Operating techniques

1. Unless stored or treated outside as specified waste²:
 - a) all bulking, transfer or treatment of waste shall be carried out inside a building;
 - b) all waste shall be stored in a building or within a secure container.
 - c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.
2. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

Plasterboard is not considered a specified waste and should therefore be stored in line with condition 1 above. For more information, please consult the list of specified wastes contained on the last page of the permit.



In addition to above, the amount of inert material on site is impacting the hardstanding's ability to permeate, which during the time of inspection was thick with mud. Please note, deterioration of infrastructure such as a hardstanding, whilst it has not resulted in action pollution, it is foreseeable that failure to maintain the hardstanding, could have the potential to result in a pollution incident if it is not addressed.



As a result of the 2 non-compliances detailed above, a consolidated Category 3 breach has been recorded against permit condition 2.3.1 under sub-criteria W1A – General Management.

Action: Please remove and quarantine the waste that included plasterboard within the inert stockpile. Please send photographs to Natural Resources Wales of this material quarantined and stored in line with Table 2.3. Please provide this by 1st March 2025.

Action: Please also provide an action plan detailing how you plan to deal with the existing stockpile that is on site, including a time schedule and how you plan to manage future waste acceptance of inert material. Please provide this via email by 1st March 2025.

Action: Please ensure the hardstanding area is able to percolate rainwater effectively and remain permeable, undertaking any necessary maintenance. Please send photos once complete to Natural Resources Wales, please do so by 1st March 2025, or alternatively propose a date for completion of the required maintenance, by 1st March 2025.

Advice and Guidance:

Please note you cannot process the inert material under the limits of your activities. Please refer to Table 2.1 Activities for further information.

Wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery but these rules will not allow any waste treatment activities such as screening and crushing.

This would also not be possible under an exemption as it does not meet the criteria. For further information please visit the following link: Choosing waste exemptions for waste management activity - GOV.UK

Please ensure that the hardstanding is regularly inspected and maintained to ensure future compliance with your permit.

In addition to the above, in relation to the handling and storage of waste this does not adhere to the sites Environmental Management System (EMS) dated February 2024 which says, 'waste is inspected while on the weighbridge and then tipped in the appropriate area designated for that waste' (Part 3, page 57).

And the Management System should also outline site procedures in relation to maintenance of site infrastructure, as per How to comply with your Environmental Management System guidance, which should then also be adhered to.

As a result, a Management System category 3 breach has been recorded as a root cause breach against permit condition 1.1.1, under sub-criteria W1A General Management.

Action: Please ensure operations on site are performed in line with the procedures contained within the sites Environmental Management System by 1st March 2025, which should also be written in line with How to comply with your Environmental Management System guidance.

Notifications

As part of the inspection, the Operator was informed that Natural Resources Wales had received a report of burning waste on site.

The operator explained that there had been a skip fire a few weeks prior, during the night. Whilst on

site we saw the remnants of a fire in a burnt-out skip.

Please note, the report Natural Resources Wales received showed a fire burning during daylight hours.

Condition 4.3.1 states –

“Natural Resources Wales shall be notified without delay following the detection of:

Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;”

We note the operator did not inform Natural Resources Wales of the fire on site, as required under permit condition 4.3.1 (a).

As a result, a Category 3 breach of permit condition 4.3.1(a) has been recorded under sub-criteria W4C.

Action: Please ensure compliance with 4.3.1(a).

Fire – WARNING

In relation to the skip fire and remnants seen on site by officers as shown below, a warning is being issued on this occasion.

**Advice and guidance:**

SR2008 No1 rules do not permit the burning of any wastes, either in the open, inside buildings or in any form of incinerator.

Inspection concluded at approximately 11:20am. We thank you for your time during the inspection.

If you have any queries in relation to this Compliance Assessment Report, please contact Daniel Hopkin on daniel.hopkin@cyfoethnaturiolcymru.gov.uk.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. 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

3. 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

4. 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 to 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.