

## Compliance Assessment Report CAR\_NRW0046280

**Permit being assessed:** XP3097EG.

**For:** Pendragon Waste & Skip Hire, **held by:** Pendragon Waste & Skip Hire Ltd

**At:** Thornhill Road, Cwmgwilli, SA14 6PT.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 31/01/2025 between 09:00 and 17:00.

**Parts of permit assessed:** General site inspection.

**NRW Lead Officer:** David Ellar.

**Report sent to:** Paul Griffiths, Director, 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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Action only (X)	
W2F - Waste - Operations - Technical requirements	Action only (X)	
W2D - Waste - Operations - The site	Assessed (A)	

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

Total 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?

Criteria	Action needed	Complete by
W2A	All waste 'Unless stored or treated outside as 'specified waste' must be stored in a building or sealed container.	10/02/2025
W2F	Please supply COTC certification and evidence of Continuing Competence for the site TCM Diane Thomas.	28/02/2025

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.

**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

An unannounced site inspection was undertaken at Pendragon Waste & Skip Hire Limited, permit number EPR/XP3097EG by David Ellar and Hugh Martin (NRW).

The weather was damp and it had recently been raining.

**Permit breaches identified:**

No permit breaches were observed during this visit however a couple of actions have been identified.

**Previous inspections:**

No breaches were noted during our last inspection, see CAR\_NRW0042101 for full detail.

**General Observations:**

The site was closed with only one maintenance operative on site. There were some ongoing works to the site including repair and maintenance of the impermeable floor of the treatment building and the access ramp to it.

Photograph showing concrete works:



The building was empty and clear of waste, but there was around 20 or so '8 yard' skips of mixed waste on the yard. David Ellar spoke to company director Paul Griffiths on the telephone during the visit to confirm what was happening at the site. Mr Griffiths explained that the waste had to be moved outside due to the concreting works in the building, and all waste will be either moved back inside or removed from site as soon as the concrete had cured. The site had not accepted any waste whilst works were being undertaken and the site would remain 'closed' until works had been completed and was back operation in accordance with permit and EMS.

*Condition 2.3 and table 2.3 of permit states:*

*Unless stored or treated outside as specified waste:*

- 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.*

All waste that was 'temporarily' stored outside and not in building was being stored in skips as can be seen by the following photograph:



This has not been scored as a permit breach as it was a necessary (and short term) action to improve the site infrastructure. The waste was in containers, the site was closed but being monitored, and the waste will be moved back inside building as soon as concrete condition allows.

**ACTION:** Store all waste in accordance with Permit conditions and move waste back inside the building as soon as concrete has cured.

**COTC/TCM:**

In September 2024 NRW were notified that the previous TCM had left. Diane Thomas is the new TCM for the site however NRW do not have TOCT details on file..

**ACTION:** Please email site officer details of Diane Thomas's certification and evidence of Continued Competence.

**Waste Returns:**

Waste returns were checked and were found to have been submitted for Q1 - Q3 24/25.

Thank you for your time during our visit.

Ends.

**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.

**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](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.