

Compliance Assessment Report CAR_NRW0046382

Permit being assessed: QP3195FQ.

For: Glogue Quarry Transfer Station, **held by:** Mansel Davies & Son Ltd

At: Nr Llanfyrnach, Hermon, Pembrokeshire, SA36 0ED.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/02/2025 between 11:20 and 12:00.

Parts of permit assessed: Permitted Activities.

NRW Lead Officer: Sally Wakeford, accompanied by David Ellar.

Report sent to: Operator, Operator, on 19/02/2025.

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	Action only (X)	

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
W1A	Contact the NRW Officer detailed above to discuss the way in which you wish to proceed, either surrender or variation to the permit.	14/03/2025

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.

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

On 07 February 2025 a site inspection was undertaken at Glogue Quarry Transfer Station EPR/QP3195FQ by NRW Officers Sally Wakeford and David Ellar. There was no one on site and access was gained over the stile on the upper gate. The weather was dry and cold.

Site Inspection

No issues were identified during the site inspection. The gate was securely locked, no waste deposits were observed, and the site has been non-operational for some time.

The permit allows for underground tanks for the storage of waste oils, however due to changes in legislation since the permit was issued the permit must be varied with regard to the Industrial Emissions Directive.

Industrial Emissions Directive

On the 22 April 2016 you were sent a letter and Compliance Assessment Report CAR_NRW0017486 regarding the Industrial Emissions Directive.

It was discussed with you in a meeting on the 6 April 2016 that the current hazardous waste transfer station permit needs to be varied to reflect the changes in legislation. This would modernise the conditions and incorporate the limitations of the Industrial Emissions Directive that apply to facilities that have capacity to store more than 50 tonnes of hazardous waste per day.

You have indicated in the past that you wish to surrender the permit, a deadline for the submission of the application was set to the end of July 2016. If the application to surrender was not received at that time, then NRW would commence the process of varying the permit to incorporate and reflect the new legislation. This would be a Natural Resources Wales initiated variation and would be re-charge for the costs incurred.

To date NRW has not received an application to vary the permit.

If you do intend to surrender the permit, it is recommended you do so prior to us commencing the variation.

To surrender the permit you are required to demonstrate that either there can be no risk of further contamination from the site or to quantify what contamination has occurred and to address that contamination as appropriate. This can be done in two ways:

1. Show that the measures necessary to prevent contamination were appropriate and maintained throughout the lifetime of the permit; and any contamination that did occur was promptly and effectively dealt with and records have been kept to demonstrate that. And/or;
2. Compare the characterisation data provided at application and surrender to show if there has been any contamination from the operation. Site Condition Reports are

used to show this.

As the transfer station permit was issued in 1992 under the Control of Pollution Act, it was not required to assess the state of the land or groundwater prior to operations. A letter would have been sent to you advising you to maintain records that demonstrated the measures taken to protect land and groundwater.

If you do not have these complete records you will need to undertake a site investigation. This investigation will have to include soil and groundwater samples around the tanks and at a depth below the base of the tank. The samples should be analysed for hydrocarbons.

At the time of the surrender application, you will need to submit a Site Condition Report (SCR) alongside the application forms. More information on Site Condition Reports and the Surrender Guidance can be found here:

<https://naturalresources.wales/permits-and-permissions/waste-permitting/apply-to-surrender-give-up-all-or-part-of-a-waste-permit/?lang=en>

and

<https://nrwcmstv13-a3hwekacajb3frbw.a02.azurefd.net/1215/environmental-permitting-regulations-guidance-for-applicants-h5-site-condition-report-guidance-and-template.pdf>

Please contact the officer detailed above as soon as possible to discuss the way in which you wish to proceed. If we do not hear from you, NRW will be required to vary the permit to reduce the levels to below the IED limit.

END

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource 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 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.