

## Compliance Assessment Report CAR\_NRW0046574

**Permit being assessed:** NP3997EE.

**For:** Riverside Skips Transfer Station, **held by:** Riverside Skips Limited

**At:** Unit 12, Greens Industrial Estate, The Roe, St Asaph, Denbighshire, LL17 0LT.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 11/03/2025 between 11:40 and 11:55.

**Parts of permit assessed:** waste storage, security, waste returns, EMS.

**NRW Lead Officer:** Boguslaw Pierzchala.

**Report sent to:** Nicki James, Owner, on 18/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W4B - Waste - Information - Reporting	Action only (X)	
W1A - Waste - Management - General management	Assessed (A)	
W3A(3) - Waste - Emissions and monitoring - Emissions to land	Assessed (A)	
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
W4B	Could you clarify if the codes are a true reflection of what was accepted on site in 2024	31/03/2025
W1A	Please provide a copy of your current EMS	24/03/2025

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 Tuesday the 11<sup>th</sup> of March 2025 Natural Resources Wales waste regulations officer carried out an unannounced routine site inspection.

The site is operational; however, at the time of the inspection the gates were locked and no one was present on site.

The weather was dry, sunny and windy.

The officer phoned Nicki James, site owner, to make him aware of the inspection and to arrange a post-inspection discussion.

The site appeared well organised with no amenity issues noted (odour, litter).

#### **W1 General Management**

Waste segregation and storage:

Waste stored on site was segregated into separate piles. The yard looked well-organised and tidy. No issues noted.

Officer saw a skip full of, what appeared to be, mixed waste outside of the permitted area where a number of empty skips were being stored.

During a follow-up telephone conversation Mr James assumed it had been left there by one of his customers. The officer phoned again, the following week and spoke to the owner's nephew, who stated that the items in the skip were not waste and belonged to a family member, who is yet to decide whether to dispose of it or not.

#### **W1 General Management**

Environmental Management System record has been checked and it would appear that NRW only has a record of the contents pages of the above-mentioned document.

This has been raised with the site owner.

**Action:** Please provide your current EMS by the 24th of March 2025

#### **W4B Reporting – waste returns**

The officer discussed waste returns with Mr James.

All quarterly submissions for 2024 have been received by NRW.

All returns are missing the certificate number and/or expiry date for the TCM - Technically Competent Manager. Please ensure all details are correctly filled out and resubmit.

It was also noted that all incoming waste was marked as **191212**.

**19 12** refers to wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified.

When queried with the site owner he stated there had been no changes to the way the business operates which would suggest the code might be incorrect.

**Action:** Could you clarify if the codes are a true reflection of what was accepted on site in 2024. Please reply by the 31<sup>st</sup> of March 2025

Should you wish to discuss anything raised in this form please contact me directly.

Thank you for your time during the inspection, please find my contact details below.

email: [boguslaw.pierzchala@cyfoethnatriolcymru.gov.uk](mailto:boguslaw.pierzchala@cyfoethnatriolcymru.gov.uk)

Kind regards,

Boguslaw Pierzchala

Swyddog Rheoleiddio Gwastraff (GD) / Waste Regulation Officer (NE)

Cyfoeth Naturiol Cymru / Natural Resources Wales

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.