

Compliance Assessment Report CAR_NRW0046737

Permit being assessed: GP3690LR.

For: Tondu Waste Transfer Station, **held by:** Plan B Management Solutions Limited

At: 1 Maesteg Road, Tondu, Bridgend, Glamorgan, CF32 9DP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/03/2025 between 12:15 and 13:43.

Parts of permit assessed: All.

NRW Lead Officer: Gareth Morris, accompanied by Craig Coleman, Daniel Hopkin.

Report sent to: Leeann Neagle , Operations Manager , on 26/03/2025.

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)	

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?

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

Plan B Management Solutions Tondu Waste Transfer Station, Site Visit, Bridgend (EPR/GP3690LR)-20/03/2025

Waste Regulation Officer Gareth Morris accompanied by Senior Waste Regulation Officer; Craig Coleman and Apprentice; Daniel Hopkin visited the Plan B Management Solutions Tondu Waste Transfer Station, 1 Mastek Road, Tondu, Bridgend, CF32 9DP to conduct a routine site inspection and to assess compliance with environmental permit; EPR/GP3690LR

The operator holds a: Standard Rules Permit: SR2008No3

On arrival at site, we were met by the site Manager who kindly showed us around the permitted site.

Weather on day of inspection, was clear, dry with little wind.

Areas Assessed as Compliant and other Comments can be Found Below.

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W1A-General Management

Permit Condition 1.1.1 states: *The operator shall manage and operate the activities:*

- a. *In accordance with a written management system that identifies and minimises risks and pollution, including those arising from operations, maintenance, accidents, incidents, non-conformance, closure, and those drawn to the attention of the operator as a result of complaints.*

Upon asking the operator for a copy of their written management system. The operator provided a copy of their environmental management system (EMS) for inspection.

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Permit Condition 1.1.4 states: *The operator shall comply with the requirements of an approved competence scheme.*

The technically competent manager (TCM) attends the site regularly. Ms Leanne Neagle is the competent person who holds the WAMITAB certification for the permitted site.

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W2C- Operating Techniques

Permit Condition 2.2.2 (a) states: *Waste shall only be accepted if it is of a type and quantity listed in schedule 2 table 2.2. (b) It conforms to the description in the documentation supplied by the producer and holder.*

All waste bays were well displayed, and all waste was correctly segregated. There was no evidence of mixed/contaminated waste.

Photograph 1.1



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Photograph 1.2



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W2E- Waste Acceptance

Permit Condition 4.2.2 states: *Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.*

The quarterly waste returns for the previous quarter have been received on time.

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W3G-Fire

Permit Condition 3.4.1 states: *The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.*

The operator was asked to produce a copy of their Fire Prevention and Mitigation Plan (FPMP). The FPMP was produced without delay for inspection.

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Waste fines and classification

Outlined below are the required procedures and regulations that all waste operators in Wales must adhere to under the Hazardous Waste (Wales) Regulations 2005 and the Environmental Permitting (England and Wales) Regulations 2016. It is necessary that you follow these guidelines when dealing with waste fines from treatment & processing activities. The guidance to comply with these regulations can be found within the document [Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste](#).

Waste fines are generated as a secondary waste stream of various waste treatment and processing activities. During treatment processes a secondary waste is created waste is sorted, shaken, cut, ground, or otherwise manipulated. These can take many forms, and at times can appear as a soil like output. The fine particles, which are often too small to be directly reused in primary production processes accumulate and require removal to be treated to recover what valuable material remains. These fines are potentially hazardous, and as such need to be tested to determine correct waste classification. If the waste is hazardous it will require handling and consignment under the Hazardous Waste (Wales) Regulations 2005, and if not, shipped for further treatment, will have to be disposed of at the standard rate for landfill due to it's hazardous properties.

Waste Classification and Hazard Assessment

1. Classify your waste fines as 19 12 11* (hazardous) before any movement, disposal, or recovery. These can be reclassified as 19 12 12 after testing and classification is determined.

2. Conduct a thorough hazard assessment, including:

- Identification of potential hazardous properties
- Evaluation of persistent organic pollutants
- Assessment of flammability potential

Chemical Analysis and Hazard Evaluation

3. Perform chemical analysis to determine the composition of waste fines, testing for:
 - Heavy metals (e.g., lead, mercury, cadmium)
 - Organic compounds
 - Other potentially hazardous substances
4. Apply appropriate hazard statement codes based on the chemical analysis results.
5. Compare concentrations of hazardous substances against WM3 thresholds to determine classification as hazardous or non-hazardous.

Documentation and Management

6. Maintain comprehensive documentation of the assessment process, including:
 - Test results
 - Classification rationale
 - Applied hazard statement codes
 - Use this information to create waste characterisation and compliance sampling plans
7. Select an appropriate, authorized waste management route based on the classification.

Compliance with Regulations

8. Ensure compliance with the Environmental Permitting (England and Wales) Regulations 2016 for waste treatment and storage activities.

9. Adhere to WM3 guidance for proper storage, sampling, and consignment of waste:

- Store waste securely to prevent pollution
- Maintain and regularly update waste characterisation and compliance sampling plans
- Use appropriate containers and labelling
- Conduct regular sampling to verify waste characteristics
- Complete hazardous waste consignment notes for each movement

10. Register as a hazardous waste producer with Natural Resources Wales if you produce or store more than 500 kg of hazardous waste per year.

11. Keep detailed records of all consignment notes and waste details for at least three years.

Failure to comply with these regulations can result in severe penalties, including fines and prosecution.

By following these guidelines, you will ensure compliance with the relevant legislation. If you have any questions or require further clarification, please don't hesitate to contact your regulatory officer.

If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Gareth Morris

07966730983

Gareth.morris@naturalresourceswales.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.