

Compliance Assessment Report CAR_NRW0048156

Permit being assessed: UB3097TE.

For: Pilkington Asbestos Removal Services Ltd, **held by:** Pilkington Asbestos Removal Services Ltd

At: Rhyl, Rhyl, Denbighshire, LL18 2PL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 28/04/2025.

Parts of permit assessed: Monitoring and records 2.2 Waste acceptance 2.2.1 Waste shall only be accepted if: (a) it is of a type and quantity listed in table 2.2 below; and (b) it conforms to the description in the documentation supplied by the producer and holder..

NRW Lead Officer: Joe Weatherley.

Report sent to: Derek Edward Pilkington, TCM/Manager, on 24/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W4B - Waste - Information - Reporting	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
W2E	Please clarify whether or not waste type 17 08 01* was accepted at site and provide copies of consignment/waste transfer notes for the two transactions shown in Fig 1.	09/06/2025
W4B	Investigate discrepancies between waste returns and consignee return figures. Inform NRW of outcome and provide correct figures for both returns.	09/06/2025

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

Review of waste returns

A review of Waste Return submissions for permit UB3097TE has been completed. The last review was carried out on 03/02/2021.

Waste acceptance 2.2.1

"Waste shall only be accepted if: (a) it is of a type and quantity listed in table 2.2 below; and (b) it conforms to the description in the documentation supplied by the producer and holder."

The(Q2) waste return dated 19/07/2022 lists the waste code 17 08 01* as being received at site on two occasions. Once from Gwynedd and once from Greater Manchester.. (see fig 1 below) This waste code is not of a type listed in table 2.2 of the permit. Nor is it listed in the site permit variation.

Action Please clarify whether or not waste type 17 08 01* was accepted at site and provide copies of consignment notes for the two transactions as shown below by 09/06/2025.

Fig 1. Screenshot of entries in the waste return dated 19/07/2022

8	Gwynedd	170801	Asbestos Amphibole	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
9	Gwynedd	170605	Asbestos Chrysotile	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
10	Isle of Anglesey	170605	Asbestos Chrysotile	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
11	Wrexham	170605	Asbestos Chrysotile	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
12	Merseyside	170605	Asbestos Chrysotile	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
13	Greater Manchester	170801	Asbestos Amphibole	D15 Temporary storage of waste pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)			
14							

Waste Returns Vs Consignee Returns comparison

There appear to be discrepancies between quantities recorded on waste transfer submissions and those recorded on the NRW hazardous waste consignee submissions (See table 1 below). This is the case for **2022** and **2024**. As this site deals only with hazardous waste, both sets of documents should match up precisely in respect of quantities. Waste transfer notes record quantities in metric tonnes (1000Kg), whilst consignee notes use Kilogrammes.

TABLE 1	2022	2023	2024
Waste Returns (tonnes)	80.256	72.107	82.687
Haz Waste Returns(Kg)	98026	72106	60509

Action: Look into this issue and establish if any returns (waste returns or consignee returns) for the years 2022 and 2024 were submitted with inaccurate information. Establish if any waste or consignee returns have not been submitted. Please inform us of your findings and upon doing so, re submit any correct returns and any that are missing, to NRW by 09/06/2025.

NRW have an EMS for the site which was received along with a TCM WAMITAB certificate in 2014. The EMS should be updated whenever there is a change in the operation and should be reviewed regularly

Action: Please send most recent versions of both documents to NRW.

Should you wish to discuss the contents of this report, please don't hesitate to contact me using the details provided below.

Kind Regards

Joe Weatherley

Waste Regulation Officer (NE Waste Regulation Team)

Email: joe.weatherley@cyfoethnaturiolcymru.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

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 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.