

Compliance Assessment Report CAR_NRW0048610

Permit being assessed: DB3198FC.

For: Arch Services Recovery Facility, **held by:** Arch Utility Services (SW) Ltd

At: Unit 2, Ynyshir Ind Est, Llanwonno Rd, Porth, Rhondda Cynon Taff, CF39 0HU.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/06/2025 between 10:44 and 12:20.

Parts of permit assessed: ALL.

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

Report sent to: Nicholas Lang, Health and Safety Manager , on 20/06/2025.

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

Arch Utility Services (SW) Ltd Site Visit, Porth, Rhondda Cynon Taf, (EPR/DB3198FC)

Waste Regulation Officer Gareth Morris accompanied by Hazardous Waste Officer Craig Coleman and Apprentice Dan Hopkin visited Arch Utility Services (SW) Ltd on Thursday 12th June 2025 to conduct a routine site inspection and to assess compliance with environmental permit: EPR/DB3198FC

The operator holds a: Tier Three Bespoke Environmental Permit for a non-hazardous physical treatment waste facility.

On arrival at site, we were met by the health and safety manager who kindly showed us around the permitted site.

Weather on day of inspection, was wet and overcast.

Areas assessed as compliant and other comments can be found below.

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.

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

The technically competent manager (TCM) is at the site daily.

W2C- Operating Techniques

Permit Condition 2.3.2 (a) states: *Waste shall only be accepted if it is of a type and quantity listed in schedule 2 table S2.1, S2.2.*

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

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W2E- Waste Acceptance

Permit Condition 4.2.2 states: *Within one month of the end of each year, 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.*

Quarterly returns for the previous quarter have been received on time. The Quarterly returns have been checked against the sites waste codes and are correct.

W2F – Technical Requirements

Permit Condition 2.3.1 Table S1.1 states: *All hazardous and non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage.*

During the site inspection, it was evident that all non-hazardous waste was being stored and treated on an impermeable surface with sealed drainage system. The impermeable surface was of a very good quality, with no evidence of damage, rutting or pooling of water.

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Photograph 1.1



Discussion regarding waste coding of waste leaving site.

Key Points:

- 20 03 03 is the correct code for street-cleaning residues, including gully emptyings. This code is an absolutely non-hazardous waste and is appropriate for the type of material that Arch Drainage handle.
- On-site treatment such as gravity separation, sedimentation, and air drying does not fundamentally change the nature or composition of the waste. According to [NRW guidance](#), unless treatment significantly alters the physical or chemical properties of the waste (e.g., through incineration, advanced chemical/biological treatment, or separation into distinct fractions), the original EWC code should be retained.
- Powered filtration (e.g., Siltbuster) and dewatering alone are not sufficient to require reclassification. Current guidance states that only when waste is physically or chemically transformed into new, distinct waste streams (such as separated grit, sand, or organic matter) does Chapter 19 apply. The current process simply separates water from solids

without fundamentally changing the waste's character.

- If the process were to involve significant chemical or biological treatment that fundamentally alters the waste, or if the waste is separated into new fractions, then Chapter 19 codes may become appropriate. This is not the case with the operator's current method.
- The resultant waste can continue to be coded as 20 03 03, but cannot be re-used or mixed with other soil like waste for deployment. The waste must be taken to landfill.

In summary:

The sludge produced from the gully emptying and street-cleaning residue treatment process remains correctly classified as 20 03 03. This is because the treatment methods used (sedimentation, filtration, air drying) do not fundamentally alter the waste's nature or composition. Chapter 19 codes are only used when the waste undergoes more substantial transformation. However, the waste cannot be mixed with other material for re-use and must be taken to landfill.

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.