

Compliance Assessment Report CAR_NRW0048500

Permit being assessed: JP3694FP.

For: S And K Matthews Skip Hire, **held by:** S And K Matthews Skip Hire

At: Minera, Wrexham, Clwyd, LL11 3YQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 09/06/2025 between 13:10 and 13:50.

Parts of permit assessed: waste acceptance, waste returns, storage, working plan.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Neil Mathews, Owner, on 23/06/2025.

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	C3 Minor	permit condition 1.2.1.
W4B - Waste - Information - Reporting	C4 No impact	6.2.2
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
2	4.1

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	Consolidated CCS3 score actions: ELV- Please remove the ELV from site and provide duty of care documents for the removal. Please comply by the 4th of July 2025. Roofing felt Please assess the felt and correctly code and describe this waste before appropriate disposal. Please provide duty of care documents for the disposal. Please comply by the 4th of	04/07/2025

Criteria	Action needed	Complete by
	July 2025	
W4B	Please revise and re submit the waste returns for Q1, Q2, Q3, Q4 2024	21/07/2025
W1A	Please revise, update and submit your Working Plan for assessment.	23/11/2025

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 Monday the 9th of June 2025 NRW waste regulation officer attended at S and K Mathews skip hire.

It was a pre-announced site inspection due to the owner's availability.

The site owner, Neil Mathews, was present throughout the inspection.

The weather was dry and windy.

The site appeared in reasonable order and similar waste quantities were stored on site compared to the previous inspection.

W2E- Waste acceptance

Waste acceptance was discussed with Mr Mathews. There was a slight confusion with the codes for incoming waste and Mr Mathews wanted to clarify his understanding of the coding. To ensure you code the waste correctly please refer to [Waste_classification_technical_guidance_WM3.pdf](#).

When accepting waste you need to refer to the list included in Appendix A of the site permit.

Waste which is not listed can not be accepted on site.

End of life vehicle (ELV) on site

Officer noted a single, end-of-life vehicle (ELV) on site. This issue was discussed during the last site inspection in December 2024. An action was requested to remove the ELV and provide duty of care documents for the removal by the 17th of January 2025.

To date the action has not been completed.



ELV stored on permeable ground

ELVs are not listed as permitted waste that can be accepted on site and therefore this is a breach of permit condition **1.2.1** which states: **No waste other than those, which are categorised in Table 1.2A and specified in details in Appendix A to these conditions shall be accepted at the site.**

This breach has been assigned a **CCS 3** score against the above-mentioned permit condition.

Action: Please remove the ELV from site and provide duty of care documents for the removal. Please comply by the **4th of July 2025.**

As the officer walked around the site a skip full of roofing felt was seen on site.

This type of waste is likely to be classed as 17 03 or 17 06 waste depending of its components. It could also be classed as hazardous waste, particularly if it contains asbestos or bitumen.

EWC codes 17 03 and 1706 are not listed as permitted waste that can be accepted on site and therefore it is a breach of permit condition **1.2.1**.

This breach has been assigned a **CCS 3** score against the above-mentioned permit condition and has been **consolidated into one CCS 3** under the same criteria- **W2E- Waste acceptance.**

Action: Please assess the roofing felt and correctly code and describe this waste before appropriate disposal. Please provide duty of care documents for the disposal. Please comply by the **4th of July 2025.**

(W4B) Reporting

Waste Returns

Permit condition **6.2.2.** states: A summary of the waste types and quantities accepted and removed from the site shall be made for each quarter of the financial year and shall be submitted to the Agency within 1 month following the end of that quarter. The summary record shall be in the format detailed in Appendix B or otherwise subsequently agreed with the Agency in writing.

A review of the waste returns submissions **Q1-Q4 2024 and Q1 2025** for permit EPR-JP364FP has been completed.

The waste returns show two waste codes accepted on site, namely 191212 and 170904. Both codes are not listed as permitted waste on the site's permit.

This issue was already discussed with Mr Mathews during the last site inspection who stated it had been a genuine mistake and the 191212 code was for the outgoing waste. After that inspection an action was set to re-submit the waste returns (Q1-Q3 2024) by the 17th of January 2025. This action has not been completed.

Q1 2025 was not received by the 30th April 2025.

This breach has been assigned a **CCS4 score**.

Action: Please review and re-submit the waste returns (Q1 to Q4 2024) by the **21st July 2025**

(W1A) General management

It is noted that the Working Plan has not been updated since 2011. This has been discussed with the owner.

Action: Please revise, update and submit your Working Plan for assessment. Please comply by the **23rd of November 2025**.

Guidance can be found here [How to comply with your environmental permit](#).

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

Kind regards,

Boguslawa Pierzchala

Waste regulation Officer (Waste Regulation Team)

Email: boguslawa.pierzchala@naturalresourceswales.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.