

Compliance Assessment Report CAR_NRW0048720

Permit being assessed: LB3933AE.

For: Thomas Skip And Plant Hire Ltd, **held by:** Thomas Skip and Plant Hire Limited

At: Unit 5b, Griffiths Crossing Industrial Estate, Caernarfon, Gwynedd, LL55 1TS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 30/06/2025 between 11:25 and 12:35.

Parts of permit assessed: As below. .

NRW Lead Officer: Leon Williams, accompanied by Daniel Grant.

Report sent to: Natasha Thomas, TCM, on 14/07/2025.

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	Action only (X)	
W2A - Waste - Operations - Permitted activities	Action only (X)	
W2D - Waste - Operations - The site	C3 Minor	2.4.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	4

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
W1A	Update Environmental Management System (EMS) with information as specified below.	30/09/2025
W2A	Apply for permit variation to authorise mechanical treatment activities and consider extending the permitted site boundary.	31/07/2026
W2D	Please ensure all waste operations remain contained within permitted site boundary.	31/07/2025

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Routine site inspection conducted by Natural Resources Wales (NRW) Senior Waste Regulation Officer Leon Williams and Senior Hazardous Waste Officer Daniel Grant.

Present on site on behalf of Thomas Skip & Plant Hire Ltd were company Directors Iestyn Thomas and Natasha Thomas.

The weather was dry and sunny during the inspection.

W1A – General Management

Permit condition 1.1.1 – “The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints”.

As stipulated in Waste Technical Guidance - WM3, Waste holders and producers have a duty to determine if a “mirror entry” waste is hazardous or non-hazardous.

Construction and demolition wastes and waste soils are mechanically segregated using a riddle bucket at Thomas Skip & Plant Hire Ltd.

The mechanically treated inert wastes and waste soils produced during this riddling process can form a mirror non-hazardous waste entry as List of Waste (LoW) 19 12 12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11).

Where the composition of a mirror entry waste is not known and cannot be determined, the mirror entry waste must be classified under the ‘mirror hazardous’ entry.

The mirror non-hazardous entry that you are currently using cannot be applied until evidence has been obtained confirming the waste to be non-hazardous. This is defined in WM3.

Analysis must be carried out to determine the chemical composition of your waste to confirm these details.

A thorough initial investigation of the waste (basic characterisation), considering the key aspects to support development of a compliance testing programme is required initially.

This initial investigation must be supported by a sampling plan in line with Appendix D of WM3.

Currently, the mechanically treated wastes you produce have not been subject to a basic characterisation analysis and the current sampling plan provided in the EMS does not provide the required detail in order to support your assessment.

At present we are advising Thomas Skip & Plant Hire Ltd of these requirements.

Environmental Management System (EMS)

In our previous inspection report CAR_NRW0045846 we noted that the new Environmental Management System (EMS) produced by Oaktree Environmental Limited on behalf of Thomas Skip & Plant Hire Ltd contained references to mechanical treatment processes.

As a permit variation to enable the site to treat wastes by mechanical means has not yet been obtained. All references to mechanical waste treatment processes must be removed from the EMS.

If a permit variation is granted, the EMS should be updated accordingly.

NRW also identified that specific waste storage procedures were absent from the EMS and that it should be expanded to include:

- “storage times and procedures to ensure that these times are not exceeded.
- maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded.
- maximum storage heights to prevent or minimise the emission of dust, litter and throughput management.
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures”.

ACTION: These EMS update requests are overdue since the 28 February 2025. Please can you ensure these updates are made and a copy of the updated EMS provided to NRW for review by the 30 September 2025.

W2A - Permitted activities

Table 2.1 activities – Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.

NRW have previously advised Thomas Skip & Plant Hire Ltd that the process of riddling inert waste and waste soils using a 360 excavator is considered a mechanical treatment process.

As defined by permit condition 2.1 noted above, the site is only able to treat waste by manual sorting or manual separation.

The company have recently applied to vary the existing permit but the application has been returned due to the activity not being permitted under standard rules criteria with the site being located 217 metres away from the Menai Strait and Conwy Special Area of Conservation (SAC).

ACTION: Submit a permit variation to allow the company to mechanically treat waste is a priority for Thomas Skip & Plant Hire Ltd.

W2D – The Site

Permit condition 2.4.1 – the activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.

During this inspection, NRW discussed the current permit boundary and how skips are being stored in various locations around the Griffiths Crossing Industrial Estate.

Please be aware that all waste storage and treatment operations must remain contained within the area shown edged in green on the plan attached to permit EPR/LB3933AE.

NRW have observed skips containing waste being stored outside the defined permit boundary on the 10 March and 30 June 2025.



As a response to this non-compliance we have issued a CCS Category 3 score against permit condition 2.4.1.

We note that certain skips are used by third parties to temporarily store wastes produced away from their normal business premises.

Such activities can be authorised in compliance with the NWFD3 (non-waste framework directive) exemption.

ACTION: Please ensure that all of Thomas Skip & Plant Hire Ltd's waste storage and treatment operations remain contained within the sites permitted boundary. A permit variation could incorporate an extension of the currently permitted boundary.

Diolch yn fawr,

Leon Williams

Uwch Swyddog Rheoleiddio Gwastraff / Senior Waste Regulation Officer

Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiol.cymru / www.naturalresources.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 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.