

Compliance Assessment Report CAR_NRW0048596

Permit being assessed: VP3494FK.

For: Melin Plas Du, **held by:** M O Jones

At: Yffor, Pwllheli, Gwynedd, LL53 6RF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/06/2025 between 10:00 and 12:30.

Parts of permit assessed: See below.

NRW Lead Officer: Sarah Walton, accompanied by Sorchá Barry.

Report sent to: M O Jones, Permit operator, on 22/07/2025.

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	C3 Minor	1.1.1
W2A - Waste - Operations - Permitted activities	C3 Minor	2.3.1
W2D - Waste - Operations - The site	C3 Minor (Suspended)	2.2.1
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
3	8

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	Review the site's EMS to incorporate procedures for waste storage (in line with guidance document 'How to comply with	15/08/2025

Criteria	Action needed	Complete by
	your environmental permit').	
W2A	Washing of waste should cease immediately and a permit variation should be sought to add this method of treatment to the site permit.	22/07/2025
W2D	Remove all waste being stored outside of the permit boundary. Stop the storage and treatment of waste beyond the permit boundary. Apply for a permit variation to extend the permit boundary.	04/08/2025
W3B	Investigate dust/particulate issues on site and likely sources and action accordingly, to prevent this causing pollution outside the site. Ensure waste is dampened down and implement EMS procedures for dust.	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

A site inspection took place on Thursday 5th June 2025. In attendance from Natural Resources Wales was Sarah Walton (Waste Regulation Officer) and Sorcha Barry (Waste Regulation Higher Education Placement Officer).

Officers met with Peryf ab Owain. It was explained the main purpose of the inspection was to issue an Environmental Protection Act 1990 Section 59ZB(2)(a) Notice, requiring the removal of waste being stored beyond the permit boundary.

The inspection began with a walk around site.

In the recycling area, there were some loose plastics which were not contained. Please ensure lighter wastes are secured so that they cannot blow off site.

Residual wastes were being shredded, destined for RDF.

ACTION: Please submit waste transfer notes showing most recent removal of RDF from site.

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;"

There was a large stockpile of skip waste awaiting treatment.



Photographs showing front and rear of waste stockpile

This stockpile of mixed skip waste, was a considerable size. Whilst on site, Peryf mentioned that the EMS had been reviewed further since the previous inspection and it was requested that this document was emailed to the regulating officer. The site submitted the revised EMS on 09/07/2025 (dated July 2025).

The EMS does not have any procedures for waste storage. The EMS makes reference to waste storage controls in the Fire Prevention & Mitigation Plan, however, this document has not yet been approved by NRW and is due to be submitted as part of a permit variation.

NRW guidance document 'How to comply with your environmental permit', specifies what information should be included in your Environmental Management System (EMS). On page 35 of the guidance document, is a section titled 'waste storage'. This lists the minimum standards for EMS waste storage procedures.

Your EMS at a minimum should contain the following controls for waste storage:

- 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
- a procedure to identify the specific waste types stored at your facility
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures.

Because the site EMS is not meeting minimum standards for waste storage, the permit has been scored a CCS C3 against permit condition 1.1.1.

Large stockpiles of combustible waste present a fire risk. As the site does not yet have a Fire Prevention Mitigation Plan (FPMP), it is important that the EMS is improved to implement controls on sizes of waste stockpiles.

2.3 Operating techniques

Permit Condition 2.3.1 "(a) For the following activities referenced in schedule 1, table S1.1 A1 to A2. The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency".

Table S1.1 states under A2 Transfer Station, "Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery".





Photographs showing waste treatment on site and waste output from water-bath

In the inert waste treatment area to the rear of the site, the site continues to treat residual skip waste using a BRUCE BWB recycling water bath. It was recorded on the previous CAR report (CAR_NRW0045954), that washing of waste is not an authorised treatment activity on the site's permit. The operator was advised to stop washing waste. However, the operator has failed to act on this advice. Officers observed waste tipping off the end of the water bath conveyor, which was tipped in the breezeblock bay (see above photograph).

Because the site continues to treat waste through washing, a further CCS C3 score has been applied against permit condition 2.3.1.

The permit has not been assessed for this treatment method and additional risk posed by this activity. The site's Environmental Management System also does not address the risk from this treatment method.

ACTION: Washing of waste should cease immediately and a permit variation should be sought to add this method of treatment to the site permit.

When staff were asked what happens to the heavy output from this machine (photographed above), differing responses were received. Initial conversations established that the waste output from the water-bath, goes into the inert treatment area. However, staff seemed to become unsure when this was challenged.

There was a stockpile of similar looking waste (from the wash bath output) being stored in the far corner of the inert treatment area (see photographs below).





Photographs of waste being stored in the inert waste treatment area

Discussions continued throughout the inspection as to exactly where this waste was destined and why it was being treated. Meurig Jones made reference to 10-20ml down but no documents were provided to show it's removal.

(W3B) Emissions of substances not controlled by emission limits

Permit condition 3.1.1 *"Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions".*

When standing in the inert treatment area, there were small white particles being blown around the site. This was getting into officer's eyes. It was entirely clear what operation this was coming from, but it was likely this was coming off the lighter fractions output from the water bath.

ACTION: Investigate dust/particulate issues on site and likely sources and action accordingly, to prevent this causing pollution outside the site. Ensure waste is dampened down and implement EMS procedures for dust.
See page 44 of NRW guidance document "How to comply with your environmental permit", which lists possible control measures for dust, mud and litter.

Please be aware that if it is identified that waste activities on site are giving rise to pollution, the operator may be asked to submit an emissions management plan.

W2D - The site

Permit Condition 2.2.1 *"The activities shall not extend beyond the site, being the*

land shown edged in green on the site plan at schedule 7 to this permit".

On a previous site inspection on 09/01/2025 (see CAR_NRW0045954), the operator was scored for breaching permit condition 2.2.1, because waste was being stored beyond the permit boundary. The operator has since been served an enforcement notice (EPA 1990 Section 59ZB (2)(a)) requiring the removal of all waste being stored beyond the permit boundary.

The operator was continuing to store waste beyond the permit boundary on this inspection. However, because an enforcement notice has been issued regarding this matter, a suspended score will be issued on this occasion. If the operator does not comply with the requirements of the notice, the score will be re-instated.

Thank you to all staff who assisted with the site inspection.

Should you wish to discuss or query anything in this CAR form, please do not hesitate to get in touch.

Kind Regards,

Sarah Walton
Swyddog Rheoleiddio Gwastraff / Waste Regulation Officer
Gogledd-Orllewin / North West

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.