

Compliance Assessment Report CAR_NRW0049022

Permit being assessed: WP3490VW.

For: Full Moon Waste Transfer Station, **held by:** Caerphilly County Borough Council

At: Cross Keys, Newport, Caerphilly, NP11 7BD.

Type of assessment: Site Inspection,

Reason: Routine.

On: 22/07/2025 between 12:30 and 13:00.

Parts of permit assessed: various.

NRW Lead Officer: Mark O'Gorman, accompanied by Carla Curtis, Cerys Phillips.

Report sent to: Scott Jones, Technical Competent Manager, on 01/08/2025.

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)	
W2D - Waste - Operations - The site	C3 Minor	Permit Condition 4.6.1 G & H
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A(1) - Waste - Emissions and monitoring - Emissions to water	Assessed (A)	
W3A(2) - Waste - Emissions and monitoring - Emissions to air	Assessed (A)	
W3A(3) - Waste - Emissions and monitoring - Emissions to land	Assessed (A)	

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
W2D	All litter to be cleaned up and placed in appropriate bays as per permit conditions. This is to be completed by 29/08/2025	29/08/2025

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

Natural Resources Wales (NRW) Waste Regulation Officer Mark O’Gorman, NRW Officer Carla CURTIS and NRW Officer Cerys PHILLIPS attended Full Moon HWRC, Full Moon Industrial Estate, Wattsville, Crosskeys, NP11 7BD-, at 12.30PM on Tuesday 22nd July 2025 to conduct an unplanned site inspection of Permit site EPR-WP3490VW. The weather conditions were dry, clear and not windy clear at the time of visit. NRW Officers O’GORMAN, CURTIS and PHILLIPS signed in and were instructed by staff on the site’s safe, designated walking routes to use for the inspection.

PERMIT INSPECTION

At the time of the visit the site was open to the public and fully operational. Site security was good, with CCTV in place and fencing surrounding the site. During the inspection NRW officers looked at the HWRC open to the public, which was in good condition. Bays and containers were clearly labelled. Waste bays were not overflowing and staff were on hand to direct customers which bays to use for their waste. The ground area for the public HWRC was in good condition and obstruction free. Waste paint tins were kept in containment units to prevent spillages and oil and batteries were kept well and appropriately. During the inspection NRW officers witnessed the presence of large amounts of litter present around the north side of the waste transfer area. The litter was loose and not contained in anyway and was strewn across the northern side of the permitted area. Litter on this scale can pose a greatly increased risk of pests on site and present an environmental impact if it were to leave site. Site security was of a good quality with high fencing surrounding the permitted site and CCTV in operation.



Image 1 show waste paint tins/cans kept appropriately.



Image 2 shows waste battery area kept in a clean manner.



Image 3 shows WEEE products kept securely undercover.

Table 4.6 Standards for handling and/or storage of wastes with specified characteristics [continued]	
Storage requirement	Specified standards
g) Wastes which are likely to attract scavengers	i) These waste only permitted if: • stored in closed or secure containers; or • stored in covered buildings providing security against scavengers, or • stored in bays provided with netting or fencing providing security against scavengers. ii) These wastes shall be subject to monitoring in accordance with condition 5.4.
h) Wastes which include light wastes or other wastes liable to give rise to litter	These wastes only permitted if: • received in sealed containers and stored in sealed containers and in areas provided with impermeable pavement and sealed drainage; or • stored in covered buildings providing containment of aerial emissions of litter; or • stored in bays provided with litter control netting or fencing.

Image 4 shows an extract from Full Moon transfer station's permit regarding litter.



Image 5 shows waste material outside of transfer area nearing site boundary.



Image 6 shows waste material beyond the transfer site yard.



Image 7 shows uncovered waste material in and around a concrete bay.



Image 8 shows soiled nappy outside of the waste transfer yard near the site boundary.

CATEGORY 3 BREACH Permit Condition 4.6.1 G & H

Table 4.6 Standards for handling and/or storage of wastes with specified characteristics [continued]

Storage requirement	Specified standards
g) Wastes which are likely to attract scavengers	i) These waste only permitted if: • stored in closed or secure containers; or • stored in covered buildings providing security against scavengers, or • stored in bays provided with netting or fencing providing security against scavengers. ii) These wastes shall be subject to monitoring in accordance with condition 5.4.
h) Wastes which include light wastes or other wastes liable to give rise to litter	These wastes only permitted if: • received in sealed containers and stored in sealed containers and in areas provided with impermeable pavement and sealed drainage; or • stored in covered buildings providing containment of aerial emissions of litter; or • stored in bays provided with litter control netting or fencing.

As per the above permit conditions, there should not be any litter present on site that is outside of designated, covered bays, covered buildings and sealed containers.

ACTION

All litter to be cleaned up and placed in appropriate bays as per permit conditions. This is to be completed by 29/08/2025

WAMITAB

Technically competent manger is Scott Jones and holds a current certificate at the time of the inspection.

ACTIONS

To please ensure that gas canisters are kept inside the site's locked cage at all times.

WASTE RETURNS

Waste returns for this permit are quarterly and need to be submitted prior to the deadline dates below.

Deadlines for submitting waste returns

Quarterly returns

Quarters	Deadline for return
January 1 to March 31	April 30
April 1 to June 30	July 31
July 1 to September 30	October 31
October 1 to December 31	January 31

CONTACT DETAILS

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Mark O’GORMAN, Waste Regulation Officer, mark.ogorman@naturalresourceswales.gov.uk, 03000654279.

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.