

Compliance Assessment Report CAR_NRW0049575

Permit being assessed: DP3494FN.

For: K M Environmental Ltd, **held by:** K M Environmental Ltd

At: Holywell Road, St Asaph, Denbighshire, LL17 0DS.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/09/2025 between 10:00 and 11:00.

Parts of permit assessed: 1.1.1.

NRW Lead Officer: Ian Thomas2, accompanied by Eleanor Pierce.

Report sent to: Michael Groves, TCM, on 08/10/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2A - Waste - Operations - Permitted activities	C3 Minor	Permit Condition 1.2.1 No wastes other than those, which area categorised below in Table 1.2A shall be accepted at the site: Table 1.1 i) Maximum storage capacity 2,500 tonnes.
W4A - Waste - Information - Records	Action only (X)	

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
W2A	Supply up to date quantities	31/10/2025
W4A	Update waste returns to reflect materials removed from site	31/10/2025

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 Thursday the 25th September 2025 Natural Resources Wales carried out a routine unannounced site inspection. The visit was carried out by Waste Regulation Officer Ian Thomas accompanied by Eleanor Pierce, Waste crime officer.

On arrival officers were met by one of the site operatives. He explained that Michael Groves was the site manager, and would be available to assist us.

Initial discussions confirmed that Michael was the TCM for the site and managed the site overall. Michael explained that the site has reduced the access for operators to bring waste materials to the site, and instead now relies on materials brought in by the construction and utilities side of the business. This way the materials can be managed better and the quality improved. This was apparent when carrying out a walk around the yard area. The stored waste, treatment area and storage of product is well segregated, giving ample space to work safely in.



Segregated materials

Permit Condition 1.2.1 No wastes other than those, which are categorised below in Table 1.2A shall be accepted at the site: Table 1.1 i) Maximum storage capacity 2,500 tonnes.



Untreated stored waste.



The subject of stored waste materials on site is still concerning, the site may be storing above the maximum permitted storage capacity of 2,500 tonnes. **Please supply a total quantity of stored untreated waste materials on site.**

This has the potential to have a minor environmental effect. Action: The site should reduce volumes of untreated wastes to less than 2,500 tonnes. **A score of C3 has been recorded until confirmation of quantities has been confirmed.**

Prior to carrying out the inspection, waste returns were checked for the site. It was noted that on all the waste returns there were no materials leaving site, I queried this with Michael and explained that, as part of the treatment on site metal was removed from the reinforced concrete and this metal was removed to outside companies. These waste returns are required to be submitted.

Action – please review waste returns to reflect materials removed from site as part of the treatment process.

All fencing work to the premises had been completed, securing the area from public access, and helping site security.

Thank you for completing the actions promptly and for your time during the visit.

Kind regards, Ian Thomas, Waste regulation Officer Please find your new regulating officer's contact details below. Email:

ian.thomas2@cyfoethnaturiolcymru.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.