

Compliance Assessment Report CAR_NRW0050129

Permit being assessed: FP3295LD.

For: Creigiau Tyres, **held by:** Mr Stephen John O' Leary, Mr Terence Peter O' Leary & Mrs Barbara Jayne O' Leary

At: Llantwit Fardre, Pontypridd, R C T, CF38 2EE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 06/11/2025 between 13:45 and 14:15.

Parts of permit assessed: 1. General Management, 2. Records, 3. Operations.

NRW Lead Officer: Marc Campbell, accompanied by Daniel Hopkin.

Report sent to: Charlotte John, TCM, on 11/12/2025.

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(a)
W1A - Waste - Management - General management	C3 Minor	1.1.4
W4A - Waste - Information - Records	C4 No impact	4.2.2

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

Total non-compliances recorded	Total non-compliance score
3	8.1

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
W1A	All documents must be available for inspection on request. All documents must be freely available to all staff to ensure correct running of the site.	Already completed
W1A	Please provide details of the sites TCM and send the certification through to us by the 5th January 2026	05/01/2026

Criteria	Action needed	Complete by
W4A	You must supply your quarterly waste returns on time as per your permit conditions.	Already completed

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 06/11/2025, Waste and Industry Regulation Officers; Marc Campbell and Dan Hopkin attended, Cregiau Tryres Ltd, Unit 1, Newtown Industrial estate, Llantwit Fardre, Pontypridd, Rhondda Cynon Taf, CF38 2EE to conduct a routine site inspection and to assess compliance with environmental permit; EPR-FP3295LD.

The operator holds a: Bespoke Permit. This site is a transfer station for waste tyres.

Breaches Recorded (Category 3 breach)

W1A- General Management

Route Cause Breach 1.1.1

Permit Condition 1.1.1 (A) states: ***The activities shall be managed and operated:***

- ***(a) In accordance with a management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and complaints.***

Actions:

On the day of the visit, we were advised by one of the workers that no one was available to let myself and my colleague Officer Daniel Hopkins in the office. This meant we could not get access to the required Environmental Management System (EMS) and Technically Competent Manager (TCM) certificate.

It is a requirement of your permit conditions that all staff and regulation officers have access to these documents at all times.

Permit condition 1.1.2 States: ***Records demonstrating compliance with condition 1.1.1***

shall be maintained.

Actions:

All documents and records including permit, Environmental Management System (EMS) and Technically Competent Manager (TCM) certificate, as well as transfer notes must be up to date and as of the time of the visit, these documents are either out of date or have not been provided to us.

We note: you have since provided an up to date Environmental Management System (EMS) and Fire Prevention Mitigation Plan (FPMP).

W1A – General Management (Category 3 breach)

Permit condition 1.1.4 States: ***The operator shall comply with the requirements of an approved competence scheme or shall hold an appropriate certificate of technical competence or other approval issued by the Agency.***

Actions:

As you advised during our phone conversation while I was at the site, you currently do not hold a valid TCM certificate. It is the responsibility of the TCM to ensure that their competency certification is up to date at all times as stated in the permit conditions above. Alternatively you will need to acquire the services of a certified TCM and provide their certification to us.

You have since advised you've booked your TCM training for the 19th of November and will provide me with the up to date certification once you have passed, along with any continuing competencies.

Action: Please provide details of the sites TCM and send the certification through to us by the 5th January 2026.

W4A – Records (Category 4 breach)

Permit condition 4.2.2 states:

Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

Action:

You are required to submit all outstanding waste returns for 2025 and put in place procedures to ensure that all future returns are completed and submitted in time. Please be aware that if no waste has been accepted during a quarter you are still required to submit a NIL return.

The required timescales for submissions are below:

Quarterly Returns Period Return Submission Deadline:

Q2 - 1st April to 30th June 31st July

Q3 - 1st July to 30th September 31st October

Areas assessed as compliant and other comments can be found below.

Condition 2.1.1, S1.1 table

On inspection, all tyres were within the correct threshold of 3m x 3m x 2.6m as stated in table S1.1.

Permit Condition 2.3.1 States:

- ***(a) 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 S1.1, unless otherwise agreed in writing by the Agency.***

Treatment consisting only of manual sorting, separation or baling of non-hazardous into different components for disposal (no more than 50 tonnes per day) or recovery.

Treatment of non-hazardous waste must be carried on an impermeable surface with sealed drainage.

Waste types as specified in Schedule 3 Table S3.1.

The site was in good condition with half of the yard concreted with no evidence of rutting, pooling of water or breaking up of the hardstanding.

Please extend a thank you to the workers on site who took us around.

If you have any queries relating to this report, please do not hesitate to contact myself on the details below.

Marc Campbell

Email: Marc.campbell@cyfoethnaturiolcymru.gov.uk

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.