

Compliance Assessment Report CAR_NRW0050063

Permit being assessed: DB3596HA.

For: G O N Granite, **held by:** We Recycle Tyres Limited

At: Workshop, Bachymbyd, Llanrhaeadr, Denbigh, Denbighshire, LL16 4PF.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/12/2025 between 10:40 and 11:20.

Parts of permit assessed: 1.1.1, EMS 2.5.1, 2.9.1.

NRW Lead Officer: Boguslawa Pierzchala.

Report sent to: Gareth Hughes, Owner, on 17/12/2025.

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	2.9.1
W1A - Waste - Management - General management	C4 No impact	2.5.1
W1A - Waste - Management - General management	Action only (X)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	4.1

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	Please ensure all waste is stored on impermeable surface	09/01/2026
W1A	Please ensure a notice board is displayed	09/01/2026
W1A	Please send a copy of your WAMITAB certificate and most	31/12/2025

Criteria	Action needed	Complete by
	up to date FPMP	

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 the 3rd of December 2025 NRW waste regulation officer carried out first site inspection at We Recycle Tyres.

The officer was met by Gareth Hughes, owner and Technically Competent Manager (TCM) for the site.

The weather was dry and sunny. However, It had been raining prior to the inspection.

The inspection started with Mr Hughes describing the activities which take place on site and the infrastructure improvements planned for December.

Waste seen onsite was in line with codes and types listed under the permit.

(W1A) General management- Site layout and storage

The site appeared busy and untidy/cluttered in places.

The site layout, including the storage of waste tyres, was discussed with Mr Hughes.

The layout didn't seem to reflect the site plan included in the Environmental Management System – EMS submitted with the permit application.

Some of the tyres were stored stacked on impermeable surface.

It was noted tyres were also strewn on permeable ground with visible mud and water pooling in places. Please see the photos below.



Waste stored on permeable ground with



Waste tyres stored on muddy ground



Waste tyres stored on permeable ground in the far corner of the site.



Mr Hughes stated he had arranged for contractors to improve the site's infrastructure by concreting the storage areas and installing a drainage system. The works are due to start in December.

Condition 1.1.1 of the site permit states:

The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints;(...)

Section 2.9.1 of the EMS states:

Waste tyres which are stored externally are situated on an impermeable surface with sealed drainage. All surface arising on the concrete pad drains by gravity into a 10,000 underground sealed sump. The sump is alarmed and emptied when it reaches 80% capacity.

At the time of the visit the infrastructure described in the above section was not yet in place; however, waste tyres were stored in the areas indicated as impermeable on the site plan.

Mr Hughes stated that concrete bays and walls should be installed in the next two months.

This breach has been assigned a **CCS 3** score against the relevant permit conditions

Action: Please ensure all waste is stored on impermeable surface. Please comply by the **9th of January 2026**

Please ensure any potential changes to the site layout are reflected in the EMS.

(W1A) General management - Notice board

It was noted that the site does not benefit from a notice board.

It has been raised with Mr Hughes who stated he would order one immediately.

Order confirmation has been received by NRW since the inspection.

Section 2.5.1 of the EMS states:

“ A notice board is erected at the site entrance displays the following information: • The site name and address. • The name of the permit holder and operator. • The Environmental Permit number and accompanying statement stating that the site is permitted by NRW. • Natural Resources Wales contact details, Emergency No. and General Enquiries No. 0300 065 3000 • Operator’s “out of hours” emergency contact • Operating hours”

This breach has been assigned a **CCS 4** score against the relevant permit conditions

Action: Please ensure a notice board is displayed at the site’s entrance. Please comply by the **9th of January 2026**.

Firefighting equipment

During the inspection it became apparent that the firefighting equipment – fire extinguishers and fire boxes were available on site; however they were not placed around the site and instead stacked up behind some equipment and tyres, making it difficult to access.

Please ensure fire extinguishers are readily available in case of an emergency.

(W1A) General management -TCM

Wamitab qualifications have been discussed with Mr Hughes who is the site's TCM.

Action: Please provide your WAMITAB certificate by the **31st of December 2025**

Fire prevention and mitigation plan – FPMP

The site benefits from a FPMP. A copy is kept in the office and was seen during the inspection.

Action: Please provide a copy of the FPMP for our records by the **31st of December 2025**.

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.