

## Compliance Assessment Report CAR\_NRW0050582

**Permit being assessed:** TP3999VA.

**For:** Ruthin Waste Transfer Station, **held by:** Denbighshire County Council

**At:** Ruthin, Denbighshire, LL15 1LY.

**Type of assessment:** Audit,

**Reason:** Incident Response (Incident number 2600552).

**On:** 10/02/2026.

**Parts of permit assessed:** Waste Acceptance, General Management, Reporting to NRW.

**NRW Lead Officer:** Molly Callow.

**Report sent to:** Alan L Roberts, Waste Contract & Strategy Performance Manager, on 10/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	C3 Minor	Schedule 2
W2E - Waste - Operations - Waste acceptance	Action only (X)	
W1A - Waste - Management - General management	C3 Minor	1.1
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	C4 No impact	4.2

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
W2E	Must no longer accept EWC 20 01 99 on site at Ruthin WTS,	10/02/2026

Criteria	Action needed	Complete by
	or any other non-permitted waste stream.	
W2E	Please provide copies of waste transfer notes, evidencing the movement of this food waste from Ruthin WTS to Denbigh WTS, and provide amounts.	25/02/2026
W1A	Send out a reminder and/or toolbox talk to operational staff on what wastes are permitted back on site at Ruthin WTS.	25/02/2026
W1A	Investigate why there are issues with waiting times at the Denbigh WTS.	25/02/2026
W4B	Submit waste returns for Q4 2025 for Permit TP3999VA	25/02/2026

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

Dear Mr Roberts,

This Compliance Audit Report has been raised following a report to Natural Resources Wales of AHP (Absorbent Hygiene Products) and Food Waste being mixed in with general municipal waste, an email was sent to yourself (*Waste Contract & Strategy Performance Manager* for the site), to gain further insight. You have confirmed that following some internal inquiries, that there had been incidences of these wastes being mixed.

Please read the below comments and actions, to rectify the non-compliances.

-----

#### **AHP Waste EWC 20 01 99**

EWC 20 01 99, is not included within the permit TP3999VA.

However, it has been communicated to us that AHP waste, has been tipped at Ruthin Waste Transfer Station since at least 1st October 2025.

It is said by the site that during Q4 of 2025, a total of 23.98 tonnes of AHP waste was received at the Ruthin Waste Transfer Station and 100% of this was mixed with other municipal waste (EWC 20 03 01). This was then sent for disposal at Enfinium's Parc Adfer

(Weighbridge Road, Deeside Industrial Park, Deeside, Flintshire, CH5 2GY).

**This is a breach of the permit** as EWC 20 01 99, is not included as an accepted waste stream at the site.

However, please note that if you do want to accept EWC 20 01 99 at the site you will need to vary your permit. This can be done by via our website here: [Natural Resources Wales / Apply to change to, or vary, a bespoke waste permit](#)

**Action:** Must no longer accept EWC 20 01 99 on site at Ruthin WTS, or any other non-permitted waste stream.

**Date:** Immediately

#### Food Waste EWC 20 01 08

EWC 20 01 08 is included within the permit for the site.

Typically deposited food waste is regularly transferred to a sealed skip before transportation to the Biogen anaerobic digestion facility in St Asaph (Waen, near St Asaph, Denbighshire).

However, we have been informed that due to the *"relatively small volumes of commercial food, the sealed skip was routinely removed less than a quarter full and taken to the Denbigh WTS where it is topped up with household collected food waste before onward shipment to the AD facility."*

However, we have also been made aware that on occasion, the food waste was mixed with municipal waste at Ruthin Waste Transfer Station, for further transport to the Parc Adfer site, rather than being kept separate for further transport to the anaerobic digestion facility in St Asaph.

According to the site, during Q4 of 2025, a total of 37.54 tonnes of food waste was received at the Ruthin WTS, of this, it is said that >50% of this material was kept separate and sent for AD treatment.

**Action:** Please provide copies of waste transfer notes, evidencing the movement of this food waste from Ruthin WTS to Denbigh WTS, and provide amounts.

**Date:** 25/02/2026

#### Management Failures

Poor communication between management and operational staff on which wastes are permitted at Ruthin Waste Transfer Station.

**Action:** Send out a reminder and/or toolbox talk to operational staff on what wastes are permitted back on site at Ruthin WTS. Provide evidence once this is completed.

**Date:** 25/02/2026

Waste brought to the Ruthin Waste Transfer Station as apparent issues with waiting times at Denbigh Waste Transfer Station - this will need to be addressed.

**Action:** Investigate why there are issues with waiting times at the Denbigh WTS. Provide evidence once this is completed.

**Date:** 25/02/2026

#### Waste Returns

As of 10th February 2026, Natural Resources Wales have not yet received Q4 2025 waste returns for Permit Number TP3999VA. The Q4 2025 waste returns deadline was 31st January 2026.

**This is a breach of Section 4.2 of the Permit.** Waste returns must be submitted to [waste.returns@cyfoethnaturiolcymru.gov.uk](mailto:waste.returns@cyfoethnaturiolcymru.gov.uk). This includes null returns.

**Action:** Submit waste returns for Q4 2025 for Permit TP3999VA  
**Date:** 25/02/2026

-----  
Please be aware that as a result of the above breaches the site has been issued a warning.

Let me know if you have any further questions on the above.  
Best,



**Molly Callow**

**Swyddog Gwastraff Peryglus** / Hazardous Waste Compliance Officer  
**Tîm Gwastraff - Gogledd Ddwyrain Cymru** / Waste Team - North East Wales

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

*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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

**Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

**Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.