

Compliance Assessment Report CAR_NRW0050161

Permit being assessed: FP3590LV.

For: Rhuddlan Bach Quarry Landfill Site, **held by:** Clive Hurt Anglesey Limited

At: Rhuddlan Bach Quarry, Brynteg, Anglesey, LL78 7JJ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 11/06/2026.

Parts of permit assessed: Environmental Management System.

NRW Lead Officer: Sarah Walton.

Report sent to: Sam Higgitt, Environment Manager, on 12/06/2026.

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	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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	Amend EMS using recommendations below and then submit a copy to NRW.	14/08/2026

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.

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

The permit operator for EPR/FP3590LV (Clive Hurt Anglesey Limited), has recently come under new ownership.

Given the change of ownership, a new Environmental Management System has been submitted by the operator for NRW review.

This CAR report is a record of NRW comments against the site EMS. As this is the first draft, comments are recorded as action only for the time being.

In order to generate an EMS, it is advised that a risk assessment is completed for the facility, to identify the risks posed by the operation, which should in turn feed into formation of EMS.

Criteria	Included? Yes/No	Comments	Recommendations	Page/s of EMS
Management	Yes	Management contacts in introduction 1.5 Management techniques	- Clearly define roles, responsibilities and authorities for the EMS and how intended outcomes will be achieved. - A commitment to compliance auditing and EMS review cycle. - Consider including an Environmental Policy and make reference to relevant legislation and guidance documents.	Pg 5
Site plans	No	Permit boundary included, but no detailed site plans included. Drawing 1724-2 lacks detail - see comments adjacent.	Include a detailed site plan, drawn to scale, which highlights the following: - the activities carried out covered under the permit and any discharge points - a drainage plan which identifies both surface and foul drains and the final destination of any drain - points designed to	Drawing 1724-2

			control pollution, for example inspection or monitoring points. • the location of all waste activities such as storage areas for skips (full and empty) and quarantine areas for non-conforming wastes. • the location of any oil and chemical storage facilities • important or sensitive local receptors such as neighbours, sensitive wildlife areas, rivers, underlying groundwaters • potentially contaminated land on your site.		
Risk assessment	No	No risk assessment included in the EMS document.	• Include Risk Assessment for the site, to help identify the risks that your operation poses to the environment and how these risks will be managed. This should be a systematic identification of environmental aspects, including risk ranking and control measures.		

Waste acceptance	Yes	3.1 'Preliminary and waste acceptance WM3 procedures'	Further detail could be added on the following: • the location where checking will be carried out (when waste is brought onto site) • the extent of visual checks and type sampling and analysis required for transfer station and landfill disposal • quarantining unacceptable waste. Create robust controls regarding waste types that will be accepted. Some confusion could arise between waste types on permit vs waste types within EMS that will be accepted. Define a procedure to ensure it is clear for all staff what waste is to be accepted.	pg8
Waste storage	Yes	1.7 'Waste Storage, Types & Quantities'. 1.7.4 'A log of incoming and outgoing wastes is maintained in the site office to assess storage volumes'. Drawing 1724-02 identifies 'landfill area' and 'overburden stockpile' and 'existing surface water lagoon'. 4.4.2 'Stockpiles will be kept to 4m	Further detail could be added on the following: • Drawing 1724-02 requires further detail to identify each waste type and storage area. • Expand on point 1.7.4 with procedures that ensure storage times are not exceeded. • Stipulate maximum storage capacities for each specified storage area, including procedures for ensuring these capacities are not exceeded. • Procedure for identifying specific	Pg 8

		during summer months and 6m all other times. 'stockpiles for wastes and products stored in bays must be kept at least 0.5m below the top of the structures holding the wastes'	waste types stored at the facility. Waste acceptance procedures point 3.2.5 - include a specific quarantine area on site for storage of non-permitted /hazardous waste. Ensure this area is contained to avoid any runoff/contamination to nearby land.		
Waste treatment	Yes	3.3 'Waste Deposit & Handling' 3.4 'Soils and aggregates treatment procedure'	- Identify treatment areas on site plan. - Break down the operations that will be carried out on your site during start up, normal operation and shut down, into a list of activities and processes, for example unloading waste, storing waste, waste disposal. - list the wastes that will be produced by each activity or process.	Pg 14	

			List the steps you will take to prevent or minimise risks to the environment from each treatment activity or process and type of waste. Be specific about the actions you will carry out to do this.	
Monitoring, Emissions & discharges and How any potential pollution from the above activities could impact on air, waste, land and neighbours.	Yes	1.5.2 e) 'procedures and control techniques in place to minimise potential emissions to air, land and water'. 4.2.3: Programme of monitoring referenced Mud & debris 4.3 Dust - section 4.4 Odour control section 4.5 Noise management considered 4.8	- Expand on section 1.5.2 with specific procedures. - Include procedures for prevention of emissions to water (eg. to nearby sensitive receptors like watercourses) - Include procedures for environmental monitoring. Include details of monitoring schedule, emission limits and procedure if any limits are breached.	pg 24,25,26
Accidents, incidents and	Yes	5 'Emergency & Contingency	Have clear procedures for	Pg 24 onwards

emergencies		Procedures' Complaint recording procedure pg 50	notification to NRW when an incident arises including time scales. • Ensure a complaints procedure is developed and that at the entrance of the site, all appropriate details are displayed on site signage (see NRW guidance How to Comply with your Environmental Permit). • Incorporate procedures for dealing with a pollution incident on site. • Include preventative actions for each possible accident/incident.	
Site security	Yes	2.6	No comments.	
Plant and machinery use and maintenance	Yes	Section 2.11.1 references a checklist RBQ/RF/5 in Appendix 4, however this is not currently included 6.7 vehicle/ plant preventative	Detail checklists for plant machinery use and maintenance. Ensure checklist RBQ/RF/5 is added to appendix 4 & specify frequency of plant machinery maintenance checks.	Pg 28

		maintenance training		
Drainage infrastructure	Referenced	Reference made to Drawing 1724-06 but not found in EMS. Referenced in section 2.9.	Include drainage plan within EMS document so readily available. This plan should show: • direction of flow of water in the drain • location of discharge points to sewer, watercourse or soakaway • location of manhole covers/drains • location of any stop and diverter valves and interceptors.	Pg 11
Non-compliance	No		• Include information on how non-compliance will be dealt with including recording, investigating and resolution. • Details on formal link to regulatory notification	
Procedures to enable you to apply the waste hierarchy of re-use, recover, recycle, dispose	Referenced	statement included in WTNs (section 3.7.1)	• Specific reference could be made to the waste hierarchy to show how re-use/recovery will be prioritised over disposal.	Pg 18
Duty of Care & Record Keeping	Yes	Record keeping section 3.7.1	• Note retention times for duty of care documentation and	Pg 18

			where this information will be kept. • How will records be maintained and kept up to date.	

Once a review of the EMS has been completed using recommendations above, please submit a copy to NRW.

End of comments

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

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

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.