

Compliance Assessment Report CAR_NRW0048922

Permit being assessed: QP3394FB.

For: Dirtbusters Mini & Midi Skips, **held by:** Dirtbusters Skip Hire Ltd

At: Unit 1 Gallahgers Yard, Foryd Bank, Green Avenue, Kinmel Bay, Conwy, LL18 5ET.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2506058).

On: 17/07/2025 between 15:00 and 16:20.

Parts of permit assessed: As below..

NRW Lead Officer: Cheryl Griffiths, accompanied by Sarah Walton.

Report sent to: Leslie Smith, Director, on 08/07/2026.

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	C3 Minor	1.1.1
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	

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
W1A	You must ensure that waste stored on site does not exceed the permitted maximum of 10 tonnes at any time.	22/03/2026
W1A	To develop and implement a contingency plan within your EMS to address supply-chain disruptions that affect all waste storage.	22/03/2026
W1A	To develop and implement waste storage procedures which is specified within this report.	22/03/2026
W1A	Ensure that the designated competent person(s) record their attendance by physically signing the site diary during each site visit.	22/03/2026
W1A	To clear any debris and obstructions where people and plant are expected to work.	22/03/2026

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

This was an unannounced visit at Dirtbusters Skip hire Ltd, Unit 1 Gallaghers Yard, Foryd Bank, Green Avenue, Kinmel Bay, Conwy, LL18 5ET on Thursday the 17th of July 2025 conducted by Natural Resources Wales (NRW) Waste Regulation Officers, Cheryl Griffiths, and Sarah Walton.

The site inspection was conducted following an incident report received by NRW alleging noise and non-permitted waste treatment activities at the yard. During the inspection, NRW officers did not observe any non-permitted waste treatment activities taking place on site. Some operational noise was noted, however, the level and type of noise were consistent with what would be expected from normal activities at a permitted waste management facility.

Shortly after arriving on site, Mr Leslie Smith the director for Dirtbusters Skip Hire Ltd arrived to accompany NRW officers during the inspection.

At the time of our visit, the weather conditions throughout were warm and sunny and waste activities were taking place at the yard.

Upon request, on the 24th of July 2025 NRW officers received an electronic copy of the company's most up to date Environment Management System (EMS) and a copy of the most up to date certificate for your Technical Competent Manager (TCM), John Haddock that expires on the 4th of April 2027.

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A summary of the visit as follows:

Permit conditions assessed

W1A - Specified waste management operations

As stated in permit condition 1.1.1(a), 'No waste management operations shall be authorised by this licence unless

- a. Specified in and undertaken in accordance with the limitations in section the following table;**

SCHEDULE 2

Table 1.1 Specified waste management operations

Specified Waste Management Operation	Permitted Waste Types which may be subject to the Specified Operation	Limits on Specified Waste Management Operations
D15: Storage pending, on this site any of the category "D" operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced).	All	Maximum storage capacity 10 tonnes

During our visit, NRW officers noted concerns regarding the quantity of wood and inert waste stored on site, as shown in Photograph 1.



Photograph 1 - wood and inert stockpile

NRW subsequently received an additional incident report at the end of November 2025, alleging further concerns about an unsafe volume of wood waste stored in the yard. Following this report, NRW requested documentation evidencing the removal of wood waste from the site, commencing from 24 November 2025.

On 2 January 2026, Dirtbusters Skip Hire Limited provided 14 waste transfer notes relating to the removal of wood waste. Of these, ten recorded net weights exceeding 10 tonnes. This demonstrates that Dirtbusters Skip Hire Limited are repeatedly storing wood waste above the maximum permitted capacity of 10 tonnes.

In addition, no material was taken off site for the period 24 to 30 November 2025, this suggests that waste wood was accumulating to a substantial level. This level of accumulation indicates that the site exceeded the 10-tonne storage limit permitted by your environmental permit, resulting in waste being stored above authorised levels. Such accumulation presents an elevated fire risk, and if a fire were to occur, it could result in pollution entering the Afon Clwyd. Excessive stockpiling also presents broader health and safety risks to the public, site employees, and the wider environment, including an increased risk of flooding where large volumes of waste obstruct drainage pathways or exacerbate surface-water runoff.

Given the volumes of waste being managed on site, it may be beneficial for you to review whether your current permit remains appropriate for the scale of your activities. Your existing permit restricts you to storing no more than 10 tonnes of waste at any one time, and the recorded quantities strongly suggest that your operational needs are exceeding this limit. You may therefore wish to consider applying for a permit variation, which could involve moving to a Standard Rules Permit (SRP) where the criteria can be met, or alternatively a bespoke permit if your operational requirements exceed the scope of the available SRPs. [Natural Resources Wales / Waste permitting](#)

ACTION: NRW requests that Dirtbusters Skip Hire Limited must ensure that all waste types stored on site do not exceed the permitted maximum of 10 tonnes at any time.

A CCS Category 3 score has been issued in response to this non-compliance with Permit Condition 1.1: Specified Waste Management Operations.

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W1A – General Management

As stated in permit condition reference A (as per the Regulations), ‘The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.

All waste permits holders whose permits were granted before 6th April 2008 are now required to have an environmental management system as per Part 3 (1) of The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018.

It was confirmed by Dirtbusters Skip Hire Ltd via email on the 2 January 2026, that the excessive volume of wood waste stored on site resulted from a disruption within your supply chain. While this explanation is noted, the *How to Comply with Your Environmental Permit* guidance requires operators to maintain appropriate contingency plans for situations where supply-chain issues may affect normal site operations. Such plans must ensure that waste storage remains within permitted limits and that operational controls continue to prevent risk, even when external service providers are unable to collect or process waste as expected.

ACTION: To develop and implement a contingency plan within your EMS to address supply-chain disruptions that affect all waste storage. This plan must set out the measures to be taken when normal off-site removal routes are unavailable, ensuring that waste storage remains within permitted limits at all times. The contingency plan should be documented, communicated to relevant staff, and made available for review during future inspections.

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W1A – General Management

On the 29th of July 2025, NRW received the most up to date version of the Site Operation and Management Plan (Environment Management System) for Dirtbusters Skip Hire Ltd. NRW have reviewed your EMS and have identified areas which requires further attention such as your procedure on waste storage.

As stated under the waste storage section of the how to comply with your Environmental Permit guidance; [How to comply with your environmental permit](#)

"If you store waste pending its disposal or recovery elsewhere, your management system must include:

- storage times and procedures to ensure that these times are not exceeded*
- maximum storage capacities for specified storage areas and the facility as a whole and procedures to ensure that these capacities are not exceeded*
- maximum storage heights to prevent or minimise the emission of dust, litter, and throughput management*
- a procedure to identify the specific waste types stored at your facility*
- procedures to segregate incompatible wastes for example use of appropriate separation distances and or suitable engineering measures."*

ACTION: NRW requests that Dirtbusters Skip Hire Ltd develop the procedures detailed above, submit them to NRW for review, and implement them in full on site by no later than 22 March 2026.

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Following our review of your Environmental Management System (EMS), we have identified further areas requiring attention. NRW expects Dirtbusters Skip Hire Ltd to ensure that all procedures within the EMS are fully understood and adhered to by all staff, and that site operations are consistently carried out in accordance with these documented requirements.

As stated under section 4 in your Site Operation and Management Plan, *"the transfer compound and central apron floor is to be kept clear of debris and obstructions where people and plant are expected to work."* Photograph 2 shows that the operational floor surface is not adequately cleared of debris, creating obstructions in an area where people and plant are expected to work.



Photograph 2 - Condition of Working Area

ACTION: *NRW requests that Dirtbusters Skip Hire Ltd is to clear any debris and obstructions where people and plant are expected to work within the compound and central apron floor, and to ensure this area is maintained in a clean and unobstructed condition at all times going forward.*

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W1A - Staffing and understanding of requirements of licence conditions.

As stated in permit condition 1.4.4, 'the attendance of the technical competent person(s) at the site shall be recorded in the site diary on arrival and departure.'

During our visit, we reviewed the site diary for the attendance of the technical competent person(s). While the TCM does routinely update the site diary, no signature was recorded to verify their attendance. Therefore, NRW requests that the designated TCM manually signs the site diary during each site visit to provide a clear and auditable record of attendance.

ACTION: *Dirtbusters Skip Hire Ltd must ensure that the Technical Competent Manager (TCM) physically signs the site diary on each visit to confirm their attendance, in addition to any written entries made.*

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NRW would like to thank Dirtbusters Skip Hire Ltd for their co-operation and if you have any further questions about the contents of this inspection report, please do not hesitate to contact us.

Yours faithfully,

Waste Regulation Officer

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.

end

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.