

Compliance Assessment Report CAR_NRW0052097

Permit being assessed: BP3396SL.

For: Williams Plant Hire Ltd, **held by:** Williams Plant Hire Ltd

At: Aberbechan Wharf, Newtown, Powys, SY16 3AW.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/05/2026 between 10:50 and 11:45.

Parts of permit assessed: See criteria listed below.

NRW Lead Officer: Luke Taylor.

Report sent to: Keith Williams, TCM, on 27/07/2026.

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	1.1.4
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
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	Obtain the necessary qualification for the activities being carried out, or obtain the services of a suitably qualified person	30/09/2026
W1A	Submit to NRW your sampling plan in line with WM3, along with a copy of the most recent analysis of waste which has been removed from site having been classified as 19 12 12	31/08/2026

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

This compliance assessment report relates to an inspection carried out by Luke Taylor (Senior Officer - Waste Regulation) of Natural Resources Wales.

The weather at the time of the inspection was dry and overcast and the site was operational.

The officer was accompanied by a member of staff throughout.

The following non-compliance were identified:

W1A General Management - Permit Condition 1.1.4 - Category 3

Your permit states under condition 1.1.4 that you must comply with the requirements of an approved competency scheme.

At the time of the inspection the technically competent management provision (TCM) on site was inadequate for the activities being undertaken. The current TCM, Keith Williams, holds a continuing competence certificate for Transfer Non-hazardous Waste (TSNH) and the Managing Transfer Non-Hazardous Waste (4TSNH) primary qualification.

The relevant technical competence primary qualification for this permit is CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer (MROC1) and the continuing competence is Treatment Non-hazardous Waste (TMNH).

In order to continue carrying out any treatment activities on site you must have the relevant qualification or utilise the services of a person with such a qualification. For note, the permit allows:

Treatment operations limited to manual and/or mechanical:

- dismantling
- sorting
- separation
- screening
- baling
- crushing
- chipping
- shredding

- compaction and bulking up

of permitted waste for the purpose of recovery and/or disposal.

ACTION - Obtain the necessary qualification for the activities being carried out, or obtain the services of a suitably qualified person. Deadline 30/09/2026

W1A General Management - Permit Condition 1.1.1 - ACTION ONLY

The above permit condition states that you 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; and
- (b) using sufficient competent persons and resources.

Duty of care matters, including the correct classification of waste, fall under this criteria.

During the inspection the picking line was in operation, with various wastes being sorted and screened, resulting in the production of trommel fines, a quantity of which was seen below the machine. Fines outputs from these processes treating mixed wastes or wastes comprising of more than one material, should always be categorised as either 19 12 11* or 19 12 12 following a hazardous waste assessment using WM3.

Currently, all waste leaving site from this process is doing so under waste code 19 12 12 as non hazardous, with a total of 1,490 tonnes removed in 2025.

Fines are the residual small particulate fraction arising from the mechanical treatment of waste. As wastes are handled and treated to remove larger pieces of target or residual materials, a proportion of those materials will inevitably have fragmented into smaller sized particles. Therefore all 'fines' fractions arising from a mechanical treatment process will be representative of materials found within and removed from the inputs.

As particle size decreases, it becomes harder to identify and separate materials. The increased surface area of smaller fractions leads to a proportionally higher concentration of surface-bound contaminants compared to larger fractions. Studies have found fines from the mechanical treatment of non-hazardous waste inputs can result in fines that exceed hazardous thresholds.

The steps laid out in WM3 are:

Step 4. Determine the chemical composition of the waste

Step 5. Identify if the substances in the waste are 'hazardous substances' or 'Persistent Organic Pollutants'

Step 6. Assess the hazardous properties of the waste

Step 7. Assign the classification code and describe the classification code.

A code cannot be assigned, and the waste cannot be moved, disposed of or recovered, until this has been done. To make a reliable assessment, you must plan and conduct a sampling programme to ensure you obtain accurate and representative results. A sampling

plan must be prepared before the first sample is taken to ensure all relevant factors have been considered and sufficient representative samples are taken. Detailed guidance, including around the production of sampling plans, is available in Appendix D in WM3, linked below:

[Waste classification technical guidance WM3.pdf](#)

ACTION - Submit to NRW your sampling plan in line with WM3, along with a copy of the most recent analysis of waste which has been removed from site having been classified as 19 12 12. Deadline 31/08/2026

If you wish to discuss any aspect of this compliance report, please contact me:

luke.taylor@cyfoethnaturiolcymru.gov.uk

Regards,
Luke Taylor

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

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.