

Compliance Assessment Report CAR_NRW0052574

Permit being assessed: AP3399FR.

For: Hafod Garage Waste Transfer Station, **held by:** Thomas Waste Management Ltd

At: Hafod Garage, Brynmawr, Blaenau Gwent, NP23 4GU.

Type of assessment: Site Inspection,

Reason: Routine.

On: 21/07/2026 between 10:45 and 12:00.

Parts of permit assessed: Various.

NRW Lead Officer: Cerys Phillips, accompanied by Jodie Baskerville, Susana Fernandez, Rhiannon Munro.

Report sent to: Howard Thomas, Director, on 04/08/2026.

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(d)
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W4B - Waste - Information - Reporting	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	Ensure all gas canisters are stored in a lockable cage, as specified in the working plan, by 30th September 2026.	30/09/2026

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

INSPECTION DETAILS

On Tuesday 21st July 2026 Natural Resources Wales Officers Cerys PHILLIPS, Jodie BASKERVILLE, Susana FERNANDEZ and Rhiannon MUNRO attended the facility at 10:45 am for an unannounced routine inspection of permit number EPR-AP3399FR. The weather was dry and fine at the time of inspection.

Upon arrival at the site, NRW officers met with the site manager, who gave a brief introduction regarding the site processes.

PERMIT BREACH

NRW officers identified numerous empty gas canisters uncaged, alongside other waste streams next to the tipping area (as shown in Image 1).



Image 1: Loose gas canisters

Permit condition 1(d) states:

SCHEDULE C OPERATIONAL CONDITIONS

Working Plan.

1. (a) The Statement of intended methods of operation and drawings contained within or attached to the document entitled "Operational plan for Transfer Station" submitted as part of the application for this licence shall be referred to as the working plan.
- (b) The licence holder shall obtain written approval from the Waste Disposal Authority for any proposed change in the actual conduct of the operations from the proposals approved in the working plan, as altered by any previous changes approved by the Waste Disposal Authority, before such change is implemented.
- (c) Any reference in this licence to the working plan shall include a reference to any modifications to the statement or the drawings, as appropriate, which have been approved, in writing, by the Waste Disposal Authority.
- (d) Subject to the terms of this licence, the site shall be operated in accordance with the working plan.

Specifically, condition 4.5.8 Segregation of Incompatible Wastes, states;

"Bottles of L.P Gas, Oxygen, Acetylene or other pressured containers, Found in the tipped waste, will be stored in the lockable cage adjacent to The garage. Any drums with lids on are to be coned off and their contents Identified, if possible, from the HASHAM markings. The N R W to be

Contacted for advice on handling and disposal.”

This is being scored as a **category 3 breach** under W1A - General management.

ACTION: Ensure all gas canisters are stored in a lockable cage, as specified in the working plan, by 30th September 2026.

PERMIT INSPECTION

NRW officers were escorted to the tipping area located in the upper part of the yard, where they observed numerous vehicles tipping various types of waste. This waste was then promptly segregated into clearly defined bays separated by concrete blocks. As result of a prolonged dry period, some of the waste being deposited required dust suppression. NRW officers witnessed frequent hosing of the yard area to prevent any dust from escaping site.



Image 2: Damp yard showing dust suppression

Waste is not stored onsite, and is promptly transported to landfill, incineration or reprocessors. As a result, stockpile heights were of no concern.



Image 3: Clear segregation

NRW officers observed some jet washing of the concrete impermeable surface during the inspection in the lower yard area. This is best practice to help ensure the concrete impermeable surface remains in good condition. NRW recommends jet washing of the tipping area, as there appeared to be a build-up of mud/silts from the dust suppression. As a reminder, excessive deposits of mud and silt should be removed from the impermeable surface to allow its condition and integrity to be routinely inspected. At the time of the inspection, the build-up was such that the surface could not be adequately examined.

Housekeeping was generally of a good standard given the high volume of traffic on site.

At the time of the inspection, there was no evidence of excessive noise or offensive odours arising from site activities.

WASTE RETURNS

At the time of the inspection, all waste return documents were up to date.

WAMITAB

The Technically Competent Manager for the site is William Stefan Thomas who held a valid WAMITAB qualification at the time of inspection.

CONTACT DETAILS

If you have any issues with this report please contact Cerys PHILLIPS at cerys.phillips@naturalresourceswales.gov.uk.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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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.