

Compliance Assessment Report CAR_NRW0052695

Permit being assessed: UB3097TE.

For: Pilkington Asbestos Removal Services Ltd, **held by:** Pilkington Asbestos Removal Services Ltd

At: Rhyl, Rhyl, Denbighshire, LL18 2PL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 17/08/2026 between 10:20 and 11:10.

Parts of permit assessed: 1.1, 2.1, 2.2, 2.3, 2.4, 4.2.

NRW Lead Officer: Molly Callow, accompanied by Steven White.

Report sent to: DEREK PILKINGTON, TCM/Manager, on 17/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2C - Waste - Operations - Operating techniques	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W4B - Waste - Information - Reporting	Action only (X)	
W4B - Waste - Information - Reporting	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
W2C	Ensure that all skips are locked when not in use.	Already completed
W1A	Provide a copy of most up to date certificate for the WAMITAB holder, to evidence Continuing Competency.	24/08/2026

Criteria	Action needed	Complete by
W4B	Please explain why in 2025 and Q1 and Q2 of 2026, the site accepted List of Waste Codes 17 06 01* (insulation materials containing asbestos) and 17 06 05 (construction materials containing asbestos), however only 17 06 01* has left the site.	31/08/2026
W4B	For the Waste Returns submitted for Q3 2025, it appears that the wrong unit of measurement has been used. Please clarify if this is the case and moving forward ensure the correct number is input to the waste returns.	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

On 17th AUGUST 2026, an unannounced visit of PILKINGTON ASBESTOS REMOVAL SERVICES LTD (Permit Number: UB3097TE) was completed by Natural Resources Wales Officers MOLLY CALLOW (Hazardous Waste Regulation Officer) and STEVEN WHITE (Senior Waste Regulation Officer). The visit took place from 10:20 to 11:10.

On the day of the visit the weather was slightly cloudy and dry. Officers were accompanied around site by the owner, DEREK PILKINGTON. There were no ongoing waste activities on site at the time of the inspection.

Mr PILKINGTON explained to NRW Officers the typical day to day activities of the site. He explained that they mostly only accept waste from their own activities in order to ensure external companies do not bring non-compliant waste on to the site.

Transfer Station

The transfer station is within a large metal building. There was some evidence of wear to the building, such as small holes, rust, rain water leaking into the building. Mr PILKINGTON explained that there were plans in the future to either repair the building or to knock it down and potentially rebuild it. The building was closed and locked, with an electric shutter to access inside.

Within the building were two large roll-on-roll off skips, with "Acumen" livery. Both of these were unlocked, and contained double bagged, asbestos containing materials (see Figure 1).

NRW Officers explained that the skip should be locked when not in use. This is specified in Part 2.3 "Operating techniques" of the Standard Rules Permit held by the site. However, due to the level of security on site and of the waste (double bagged, locked building, CCTV,

main gates locked out of operating hours), it is deemed appropriate to issue a recommendation for this non-compliance, however future non-compliance for the same issue of not locking the skips when not being used, will likely result in a non-compliance score against the permit.



Figure 1: Unlocked asbestos waste skip

Additionally, there was little to no signage on the transfer station building or on the large skips holding the asbestos waste. Although there is nothing specifically asking for this within the Standard Rules Permit, NRW would recommend that safety signage applicable to asbestos be located on the outside of the Waste Transfer Station, as well on the bulk containers/skips if possible.

Consignment Notes

A quick review was completed of several Consignment Notes held at the site, of those looked at, appeared to have been completed thoroughly and in compliance with The Hazardous Waste (Wales) Regulations 2005.

Waste Returns and Consignee Returns

A review of the waste returns and consignee returns for all of 2025 and Q1 and Q2 of 2026 was completed for the site. Two observations for these waste returns was made.

1. In 2025 the site accepted List of Waste Codes 17 06 01* (insulation materials containing asbestos) and 17 06 05 (construction materials containing asbestos), however only 17 06 01* has left the site. This is the same for Q1 and Q2 of 2026. Please explain why this is.
2. For the Waste Returns submitted for Q3 2025, it appears that the wrong unit of measurement has been used. It is likely that kilograms has been used instead of tonnes. Therefore for Q3 it states that 25831 tonnes were accepted on to the site. Likely this was meant to be 25.831 tonnes. Please clarify if this is the case and moving forward ensure the correct number is input to the waste returns.

All waste streams accepted by the site are covered by the permit held, therefore compliant with Part 2.2 "Waste Acceptance".

Technically Competent Manager

Please provide a copy of the most up to date WAMITAB Certificate, to evidence Continuing Competence.

Other Comments

Other parts of the permit reviewed included:

2.1 "Permitted activities"

2.4 "The site"

These were all adhered to.

Other Permits held by PILKINGTON ASBESTOS REMOVAL SERVICES LTD

During the audit, it was explained that an additional permit was held at the site: SR 2008 No 24, this was a standard rules permit for a clinical waste and healthcare waste transfer station. The site want to surrender this permit as they stated they have not used this for at least 4 to 5 years.

Further details on how to surrender this permit can be found

here: <https://naturalresources.wales/permits-and-permissions/waste-permitting/apply-to-surrender-give-up-all-or-part-of-a-waste-permit/?lang=en>

Thank you for your time showing us around the site.

Please reach out if you have any questions.

Best,



MOLLY CALLOW

Swyddog Gwastraff Peryglus / Hazardous Waste Compliance Officer

Tîm Gwastraff - Gogledd Ddwyrain Cymru / Waste Team - North East Wales

Email: molly.callow@cyfoethnaturiolcymru.gov.uk

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.