Compliance Assessment Report CAR_NRW0052678

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: Routine.

On: 13/08/2026 between 13:00 and 14:25.

Parts of permit assessed: As below. .

NRW Lead Officer: Cheryl Griffiths, accompanied by Seren Jones.

Report sent to: Leslie Smith, Director., on 09/10/2026.

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)	
W1A - Waste - Management - General management	C3 Minor (Suspended)	1.1.1(a)
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W2D - Waste - Operations - The site	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
1	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	Proceed to ensure that the compound and central apron floor	22/10/2026

Criteria	Action needed	Complete by
	remains clear of any debris and obstructions at all times where people and plant are expected to work.	
W1A	Comply with current environmental permit conditions at all times, which includes storing no more than 10 tonnes of waste at one time.	28/02/2027
W1A	Proceed to only treat waste by physical sorting and separation into different waste streams or components for disposal, recycling or reclamation.	22/10/2026
W1A	If there's any changes in the future regarding the TCM, Dirtbusters Skip Hire Ltd must notify NRW in writing within 5 working days of the change.	22/10/2026
W2D	Continue to ensure that all bays and hardstanding areas remain fit for purpose and in good condition. Any damage or deterioration identified should be repaired promptly and recorded in the site diary.	22/10/2026
W4B	The operator must continue to submit quarterly waste returns to NRW within the timescales specified by the permit. The operator must also ensure that all information contained within the returns, including waste types and quantities of waste accepted and removed from the site, is recorded accurately and is supported by site records.	31/10/2026

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

A routine site inspection was undertaken on 13 August 2026 at Dirtbusters Skip Hire Ltd at Unit 1 Gallaghers Yard, Foryd Bank, Green Avenue, Kinmel Bay, Conwy, LL18 5ET, by Cheryl Griffiths, Natural Resources Wales (NRW) regulating officer, Christopher Nunn, NRW Tackling Waste Crime officer and Seren Jones, NRW Waste Regulation (Higher Education Placement).

NRW were greeted by Mr Leslie Smith, the Director of Dirtbusters Skip Hire Ltd and Emma Smith which accompanied officers throughout the visit.

During this site inspection, NRW assessed progress against the actions identified in the CARS report issued following the site visit on 17 July 2025. Evidence was reviewed on site and discussions were held with site representatives to determine whether the required actions had been completed within the specified timescales.

The review found that the following actions had been completed and details of our findings are provided below.

-

Permit conditions assessed as below:

W1A – General Management

In response to the actions raised in the previous report CAR_NRW0048922, the operator provided an updated Environmental Management System (EMS) during the site visit on 13 August 2026. This was requested to address the requirement for a contingency plan covering supply chain disruptions affecting waste storage, together with the development and implementation of associated site procedures that were to be submitted to NRW for review. The updated EMS has been received but has not yet been reviewed by NRW. A assessment of the document will be undertaken in due course, and the findings, including any further actions required, will be communicated in a subsequent CARS report.

-

W1A – General Management

Also, in response to the action raised in the previous report CAR_NRW0048922, NRW requested Dirtbusters Skip Hire Ltd to develop and implement waste storage procedures within their Environment Management System (EMS). This procedure should include storage times, capacities and heights (with procedures to prevent exceedance), identification of stored waste types, and segregation of incompatible wastes through appropriate separation distances or engineering controls and to submit a copy of their updated EMS to NRW to be reviewed.

During the time of this visit, NRW have yet received a copy of the updated EMS procedure which specifies the sites waste storage procedures. However, the operator stated during this visit that the action is completed, and the updated EMS procedure will be submitted to NRW via email in due course. The updated EMS was submitted to NRW via email on the 15 September 2026 and it will be review in due course and a subsequent CARS report may be sent to the operator.

-

Also, noted in the previous report CAR_NRW0048922, "*the transfer compound and central apron floor is to be kept clear of debris and obstructions where people and plant are expected to work".* During the site visit on 13 August 2026, NRW observed that debris and obstructions had been removed from the compound and central apron floor and obtained photographic evidence of the improvements, which can be seen in Photograph 1 below. NRW was satisfied that this action had been completed during the visit and would like to elaborate that the area should continue to be maintained in a clean, safe, and unobstructed

condition.



Photograph 1- Debris and obstructions that has been removed from the compound and central apron floor.

Action: ***The operator must proceed to ensure that the compound and central apron floor remains clear of any debris and obstructions at all times where people and plant are expected to work.***

-

W1A - Specified waste management operations

As stated in permit condition 1.1.1, '*No waste management operations shall be authorised by this licence unless: a) specifies in and undertaken in accordance with the limitations in section the following table: Maximum storage capacity 10 tonnes'.*

Following our last visit dated 17 July 2025, that was recorded on CAR_NRW0048922, it was observed that the site was storing beyond their maximum permitted capacity which is 10 tonnes at one time. Since that visit, NRW acknowledges that Dirtbusters Skip Hire Ltd have submitted a permit variation application requesting to increase their storage capacity and annual throughput.

On 13 August 2026, the operator stated that the quantity of waste being stored on site exceeded 10 tonnes. This was consistent with NRW officers' observations during the inspection and is evidenced in Photographs 2 and 3 below.

Following a conversation, NRW stated that the permit variation has yet to be reviewed by our permitting department, Dirtbusters Skip Hire Ltd are required to comply with their current approved permit conditions, which includes the maximum storage capacity of 10 tonnes until and if the permit variation is approved by NRW.



Photograph 2 - Stockpile of mixed waste.



Photograph 3 - Wood and green waste and two Roll on Roll off skips with mixed waste.

Prior to the site visit that took place on the 13 of August 2026, NRW officer contacted our permitting department for them to provide us with an update of this variation referenced as PAN-033048, which they responded by stating that this permit variation application is yet to be reviewed by their department.

Action: ***The operator must comply with their current environmental permit conditions at all times, which includes during the application process for your current permit variation request. The operator can only carry out waste activities specified within their permit variation, when and if it approved by NRW's permitting department.***

A CCS Category 3 score has been suspended in response to this non-compliance against permit condition 1.1.1(a) General Considerations. NRW understands that the operator has applied for a permit variation to increase their maximum storage capacity and annual throughput within their authorised operations. In the interim, the operator must not store more than 10 tonnes at one time until NRW has formally confirmed that the activity is permitted.

Failure to achieve an approved permit variation by the date specified within this report, which could result in Dirtbusters Skip Hire Ltd storing beyond their maximum permitted capacity of 10 tonnes at one time will result in the reinstatement of the CCS Category 3 score.

-

Also specified in permit condition 1.1.1, '*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: Treatment consisting only of physical sorting or separation of waste into different components for disposal (no mor than 50 tonnes per day) recycling or reclamation).*

During the inspection, NRW officers observed waste treatment operations being undertaken on the yard. The activities observed were limited to the physical sorting and separation of waste, which is permitted under the site permit. No evidence of any other waste treatment activities was observed during the visit.

***Action:* The operator must proceed to only treat waste by physical sorting and separation into different waste streams or components for disposal, recycling or reclamation as specified within your environmental permit.**

-

W1A - Changes in technically competent persons.

As stated in permit condition 1.5.1, *'Any changes in the technically competent management of the site and the name of any incoming person [together with evidence that such person has the required technical competence] shall be submitted to the agency in writing within 5 working days of the change in management Technically competent management and technical competence shall be as defined under section 74 of the Environmental Protection Act 1990 and regulations 4 and 5 of the 1994 Regulations'.*

Upon NRW officer's arrival, Dirtbusters Skip Hire Ltd stated that Emma Smith have recently completed the technically competent management training (TCM) and will now be managing the site alongside the sites current TCM, John Haddock. The operator supplied a copy of the TCM certificate for the newly appointment TCM, Emma Smith to NRW officers during the visit. The documentation was not reviewed during this inspection, however, NRW will undertake a detailed review of the certificates following the visit, and a further CARS report will be issued to summarise the outcome of that assessment and identify any actions if required.

Action: Ensure that there's always one designated competent person(s) who is suitably trained and fully conversant with the requirements of this licence at all

times. If there's any changes in the future regarding the TCM, Dirtbusters Skip Hire Ltd must notify NRW in writing within 5 working days of the change.

-

W2D - Site engineering for pollution prevention and control.

As stated in permit condition 2.1.1, *'No waste shall be deposited, stored, treated or otherwise handled in any area of the site until the engineered site containment and drainage system for that area has been constructed and completed in accordance with this condition and condition 2.1.2'.*

Permit condition 2.1.2, *'The engineered site containment and drainage system shall be designed, constructed, inspected, validated and maintained, and shall be fully documented and recorded, to be fit for purpose and meet the standards specified in Table 2.1'.*

e) *All fixed bays and other fixed containers used for the storage and treatment of waste must be constructed and maintained to a standard, which is fit for purpose.*

During our visit, NRW completed a visual inspection on the site infrastructure such as the storage bay walls and hardstanding. No obvious defects were observed in the visible areas of hardstanding or fixed bays during the inspection. However, the quantity of waste stored on site restricted access and visibility to parts of the bay walls and floors, preventing a full assessment of all containment surfaces. Based on the areas inspected, there was no evidence of damage or deterioration that would indicate non-compliance with permit conditions 2.1.1, 2.1.2 and Table 2.1(e).

Action: ***Continue to ensure that all bays and hardstanding areas remain fit for purpose and in good condition. Any damage or deterioration identified should be repaired promptly and recorded in the site diary.***

-

W2D - The site

As stated in permit condition 3.1.3, *'The board shall be easily readable from outside the site entrance in daylight hours, and shall display the following information:*

c) *Operator name (Company name, not individual name unless justified as necessary).*

During the site visit, the operator's company name (Dirtbusters) was displayed in the identification board which is located at the site entrance as can be seen in photograph 4.



Photograph 4 - The site identification board located at the site entrance.

Please note, the remaining requirements relating to the site identification board under condition 3.1.3 were not assessed during this inspection and therefore no compliance determination has been made in relation to those elements.

-

W2E - Waste acceptance

Permit condition 4.4.1 states, *'All waste shall be received, inspected, accepted or rejected, and recorded in accordance with the standards specified in Table 4.4.*

a) *All waste received at the site shall be inspected on receipt to confirm their description and composition against the relevant waste transfer notes and other accompanying documentation'.*

During the NRW officer's visit, a pickup van arrived at the sites entrance seeking to dispose of several refrigerators and freezers. Site staff inspected the load and correctly rejected the waste. The operator also demonstrated awareness of the current national issues associated with the management of these waste types and acted appropriately in refusing acceptance of the load.

-

W2C - Operating techniques

As permit condition 4.5.1 states, ***'All waste accepted at and despatched from the site shall be measured in accordance with either of the following requirements:***

a) *The weight of all wastes accepted at and despatched from the site shall be determined by means of a public weighbridge, or a weighbridge or scales located within the site. The weighbridge or scales used shall record quantities of waste in tonnes to an accuracy of*

0.01 tonnes; or

***b)** the following conversion factors shall be used' Waste quantities shall be recorded in cubic metres and measured on the basis of the capacity of the vehicles or containers used for transport. This shall be converted into tonnes on the basis of conversion factors, which have been agreed in writing with the agency.*

During the visit, NRW officers asked the operator to explain the system used to record waste quantities. The operator advised that skips are not weighed individually on the site weighbridge. Instead, waste quantities for skips are estimated using an online reference chart that calculates an average weight based on the skip size and waste type. All other vehicles delivering or removing waste are required to use the site weighbridge to obtain an actual weight measurement.

Based on the information provided by the operator, it appears that the site is complying with permit condition 4.5.1. This conclusion is based on discussions held during the inspection and does not constitute a full audit of the condition. Supporting records, weighbridge data, conversion factors, and any associated agreements were not reviewed as part of this visit. Therefore, the compliance assessment is limited to the information available at the time of the inspection.

-

W4A - Records

As states in permit condition 6.2.4, *'A record shall be kept of each loads of waste accepted and each load of waste removed from the site. This record shall include the following:*

***a)** Loads in;- Nature (Solid, sludge or liquid), waste type as specified under condition 1.2, quantity (tonnes), date received, date accepted.*

***b)** Loads out;- Nature (Solid, liquid or sludge), waste type as specified under condition 1.2, quantity of waste removed (tonnes), date removed.*

During the inspection, NRW officers requested copies of Waste Transfer Notes relating to construction waste and mixed waste accepted at and removed from the site.

A compliance determination has not been made at this stage. The requested documentation will be reviewed following the inspection, and the outcome of that review may be communicated in a subsequent CAR form.

-

W4B - Reporting

As permit condition 6.2.2 states, *'A summary record of the waste types and quantities accepted and removed from the site shall be made for each quarter of the financial year and shall be submitted to the Agency within 1 month following the end of that quarter. the summary record shall be in the format detailed in appendix B or otherwise subsequently agreed with the Agency in writing'.*

NRW officers reviewed the site's records prior to the inspection. It was noted that both quarterly waste returns submitted to date (January to April and May to July) were received within the required timescale, namely within one month of the end of each reporting quarter.

Please note that this review was limited to confirming the submission dates of the quarterly returns. The content of the returns, including the accuracy of waste types reported and the quantities of waste accepted and removed from the site, has not yet been assessed. As such, no compliance determination has been made regarding the accuracy or completeness of the information contained within the returns.

Action: ***The operator must continue to submit quarterly waste returns to NRW within the timescales specified by the permit. The operator must also ensure that all information contained within the returns, including waste types and quantities of waste accepted and removed from the site, is recorded accurately and is supported by site records.***

-

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

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

"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".

ENDS

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.