

Compliance Assessment Report CAR_NRW0046505

Permit number	GP3692LQ	Operator name	RMR Recycling Limited
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Site name	RMR Recycling Limited
Site address	Pen-y-fan Pond Lane, Oakdale, Blackwood, Gwent, NP12 0HY
Assessment type	Report/Data Review

Date of assessment	26 February 2025	Time in	N/A	Time out	N/A
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Parts of permit assessed	Monitoring and reporting requirements
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NRW Lead officer	Guy Baskerville	Accompanied by	N/A
Report sent to – Name and position	[REDACTED] Yard Manager	Date	28 February 2025

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR4B - Information - Reporting	C4 No environmental impact	4.2.2

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

2. What action is required?

Criteria	Action needed	Complete by
IR4B - Information - Reporting	Operator to submit future monitoring reports inside reporting window using the correct reporting forms	N/A

Action 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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter *NRW*) assessment against RMR Recycling Limited's (hereafter '*RMR*') **6-monthly** [January – June 2024 & July–December 2024] and **annual** [2024] monitoring and reporting requirements. NRW's assessment of RMR's monitoring returns data is outside the scope of this CAR and any non-compliance arising from an exceedance of a permitted emission limit will be recorded in a separate CAR.

Condition 4.2.3 of the environmental permit states:

For the following activities referenced in schedule 1, table S1.1 (A1) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency [sic] by 31 January (or other date agreed in writing by the Environment Agency [sic]) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data.

Table S1.1 of Schedule 1 to the environmental permit is partially reproduced below.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity and waste types
A1	S6.3 B (a) (i) heating, but not distilling, tar or bitumen in connection with any manufacturing activity.	The heating of bitumous materials (asphalt) for the purpose of reprocessing it for reuse. (R5): Recycling/reclamation of other inorganic compounds	The heating of non contaminated bitumous wastes to produce ready to use asphalt.

The A1 activity referenced in table S1.1 of Schedule 1 of the environmental permit has not been, is not and is unlikely to be undertaken at the installation. Monitoring and reporting requirements in respect to this activity is withdrawn. Should the activity commence, monitoring and reporting requirements are reinstated.

Condition 4.2.4 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency [sic], submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.2; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced over leaf.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.3.1	A1	Every 12 months	1 January
Emissions to air Parameters as required by condition 3.3.1	A1	On pressure valve release	On pressure valve release
Emissions to water Parameters as required by condition 3.3.1	W1	Every 6 months	1 January 1 July

Table S4.2 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.2 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency [sic]	
Water and Land	Form air 1 or other form as agreed in writing by the Environment Agency [sic]	

The A1 activity referenced in table S1.1 of Schedule 1 of the environmental permit has not been, is not and is unlikely to be undertaken at the installation. Monitoring and reporting requirements in respect to air emission point A1 is withdrawn. Should the activity commence, monitoring and reporting requirements are reinstated.

Monitoring report(s) for emissions to water were submitted via email on 01 July 2024 and 14 February 2025.

The monitoring report(s) submission was not made inside the reporting window which represents non-compliance with the environmental permit.

The monitoring report(s) submitted include reporting of monitoring carried out in respect of the parameters and emission points specified in schedule 4 table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) submitted are for the reporting periods specified in schedule 4 table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) have been submitted using the forms specified in schedule 4 table 4.2 which represents compliance with the environmental permit.

The monitoring report(s) submitted include results and assessments as required by the forms specified in schedule 4 table 4.2 which represents compliance with the environmental permit.

As a result of the non-compliance detailed above, a CCS Score [C4] has been recorded against compliance sub-criteria IR4B - Information – Reporting.

Action : Operator to submit future monitoring reports inside reporting window using the correct reporting forms.

The operator name provided in the submitted reports has been incorrectly recorded as RMR Sand and Aggregates Limited. The permit holder and operator of the installation is RMR Recycling Limited.

Action : Operator to record correct permit holder in future monitoring report submissions.

[END]

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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 Industry compliance criteria (used in section 1 and 2):

1 - Management

- IR1A - General management
- IR1B - Finance (only applicable to Landfill)
- IR1C - Energy efficiency

- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2 - Operations

- IR2A - Permitted activities
- IR2B - The site
- IR2C - Operating techniques
- IR2D - Technical requirements
- IR2E - Improvement programme
- IR2F - Pre-operational conditions
- IR2G - Landfill engineering (only applicable to Landfill)
- IR2H - Waste acceptance (only applicable to landfill)
- IR2I - Leachate levels (only applicable to Landfill)
- IR2J - Closure and aftercare (only applicable to Landfill)
- IR2K - Landfill gas management (only applicable to Landfill)

3 - Emission and Monitoring

- IR3A - Emissions to water, air or land
- IR3B - Emissions of substances not controlled by emission limits
- IR3C - Odour
- IR3D - Noise and vibration
- IR3E - Monitoring
- IR3F - Pests
- IR3G - Air quality management plans
- IR3H - Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I - Fire

4 - Information

- IR4A - Records
- IR4B – Reporting
- IR4C - 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.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.