

Compliance Assessment Report CAR_NRW0046162

Permit being assessed: LP3439HM.

For: Roath Dock Treatment and Recycling Centre NRW/EPR/LP3439HM/V003, **held by:** Castle Waste Services Limited

At: Roath Dock Transfer Station Old Clipper Road , Roath Dock, Cardiff, CF10 4LX.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 4.2.2, 4.2.3.

NRW Lead Officer: Dale Padfield.

Report sent to: -, Operations Director, on 05/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4B - Installations - 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
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?

No action required.

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

Castle Waste Services Limited (Castle Environmental)

EPR/LP3439HM

This Compliance assessment report details the following;

- Q3 & Q4 2024 waste returns
- Q3 & Q4 2024 emission to sewer returns
- Annual performance reporting review as required by permit condition 4.2.2

Q3 (July – September) 2024 returns

Waste

Returns submitted within the reporting window. All EWC accepted EWC codes are compliant with the permit requirements. A total of 3407.2 tonnes was accepted onto site, a total of 1026.1 tonnes of waste was removed. The returns are accepted.

Emissions to sewer – discharge point S1

The returns were submitted within the reporting window. All parameters were within discharge consent limits. Hexavalent chrome was measured at 0.977 mg/l against an ELV of 0.1 mg/l, however, the same sample had a result of 0.018 mg/l for total chrome. As previously agreed, the total chrome figure will be accepted in place of the Cr(vi) result due to the Cr(vi) result being subject to interference during the analysis and the total chrome analysis method providing more accurate results (lower uncertainty and superior analysis method).

Q4 (October – December) 2024 returns

Waste

Returns submitted within the reporting window. All EWC accepted EWC codes are compliant with the permit requirements. A total of 3658.7 tonnes was accepted onto site, a total of 1102.2 tonnes of waste was removed. The returns are accepted.

Emissions to sewer – discharge point S1

The returns were submitted within the reporting window. All parameters were within discharge consent limits. Hexavalent chrome was measured at 0.897 mg/l against an ELV of 0.1 mg/l, however, the same sample had a result of <0.018 mg/l for total chrome. As such the result for total chrome is

accepted in place of the hexavalent chrome and no non-compliance will be issued.

Annual reporting 2024

Total waste inputs & outputs:

The site has accepted a total of 14,798 tonnes of waste, well within permitted limits for the installation. Please note ~ the figure provided on the annual report is incorrect and appears to quote the 2023 figure twice.

Energy:

Total energy consumption (calculated as primary energy) for 2024 was reported as 1016.02 MWh. MWh, which is broadly unchanged from 2023.

Total specific usage (KWh per tonne of waste accepted) shows a reduction on the 2023 figure, with a value of 65.7 KWh/T compared to 71.2 KWh/T reported in 2023. The 2024 value is comparable to the 2022 figure of 65.5 KWh/T.

Castle have reported that the company has made the decision to stop using mineral based gas oil for mobile plant and have switched to hydrotreated vegetable oil (HVO). This is done at an additional cost to the company, however, HVO is considered a low carbon alternative fuel and is therefore less impactful on the environment.

Castle reported that the switch to HVO has resulted in an avoided emission of 8.16 tonnes of CO_{2e}, which is commendable.

Water consumption

Water consumption was reported at 16,447 m³ which represents an increase of 2742 m³ when compared to the 2023. Prior to 2023, an estimation process had been utilised to provide a water usage estimate, as such, 2023 was the first year an actual recorded figure was reported. As such, it is difficult to determine if the increase reported in 2024 is a trend of increased water usage (specific usage increase) or if the figure reported in 2023 was irregularly high / an anomaly. Further data will identify any trend and this will be evaluated during the next annual review.

Raw materials:

Castle continue to not utilise any raw materials within the process.

Improvements:

Continued improvements to infrastructure has been made across the site, the operator has reported significant investment in improvement to civils in the yard 3 area with tank maintenance activities continued with further cleaning and painting.

The operator has reported both internal and external audits of the EMS, with no issues identified.

Improvements:

The operator intend to invest in rainwater harvesting along with refreshed office accommodation during 2025.

All reports accepted.

NRW are satisfied with the developments and investments being made at the facility, which have been evident during the site visits. Castle Environmental continue to operate as an environmental compliance band 'A' facility.

End.

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 only relating to the activity assessment
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 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 to 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.