

Compliance Assessment Report CAR_NRW0046322

Permit being assessed: ZP3899FX.

For: Merthyr Borough Recycling Centre Ltd-transfer Station, **held by:** Merthyr Borough Recycling Centre Ltd

At: Merthyr Borough Recycling, Dowlais, Merthyr Tydfil, Glamorgan, CF48 2TA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/02/2025 between 11:05 and 13:30.

Parts of permit assessed: W1A, W2A.

NRW Lead Officer: Elysia Lovelock, accompanied by Daniel Hopkin.

Report sent to: Operator, Director/Site Manager, on 19/02/2025.

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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	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?

Criteria	Action needed	Complete by
W1A	<ol style="list-style-type: none"> Please update daily inspection checklist, as agreed re mud & debris, specifying internal site surfaces, and provide a copy via email. Please provide an update regarding progress with the impermeable surface works and work with DCWW re foul 	30/04/2025

Criteria	Action needed	Complete by
	sewer connection. Once complete, please also provide a copy of the sites Trade Effluent Discharge consent to NRW. 3. Having identified the staff for training, please provide evidence of booking the courses via email, once arranged/or alternatively a date by which evidence can be provided. 4. Following the addition of a new building, please submit a revised EMS and FPMP for review to NRW. In reviewing the EMS, as we have not seen sight of the most recently amended, please ensure it contains the sites Sampling Plan.	

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 Monday 3rd February 2025, Natural Resources Wales Senior Industry and Waste Regulation Officer Elysia Lovelock and apprentice Daniel Hopkin, attended the permitted facility of Merthyr Borough Recycling Centre Limited at Unit 5, Pengarnddu Industrial estate, Dowlais Top, Merthyr, CF48 2TA. Undertaking an announced site inspection, in response to improvements outlined in correspondence received from the Operator dated 25th October 2024, following [CAR_NRW0045049](#). The weather remained fine during the inspection.

Arriving on site at approximately 1105am, we were met on site by the Operator's Environmental Consultant and were later joined by the Site Manager/Operator who is also the Technically Competent Manager.

The primary purpose of the inspection was to review progress with the planned improvements in relation to the conditions of environmental permit reference EPR-ZP3899FX, held by the Operator. And to familiarise the sites new Regulation Senior Officer Elysia Lovelock with Operations on site.

Improvements

Progress with the planned improvements and agreed actions were initially discussed in the office as outlined below, followed by a walk around site, with the sites Environmental Consultant.

1. "Increased frequency of Site surface sweeping by external contractor (with immediate effect)"

The update regarding site surface sweeping being that this that is currently still happening as and when needed. We were shown the daily inspection checklist which says the site is

inspected twice a day for mud and debris. I suggested the wording be updated to include/specify internal site surfaces.

ADVICE AND GUIDANCE: Please note, to prevent discharge beyond the site boundary, mud and debris requires continual monitoring across the site throughout the day and sweeping ad hoc when necessary.

Action: Please update daily inspection checklist, as agreed re mud & debris, to specify internal site surfaces, and provide a copy to Natural Resources Wales via email.

Due: 30th April 2025

2. 'There are works ongoing for boundary wall upgrades in Area D which will consist of surface concreting with a concrete 'lip' at the interface with the boundary wall to address NRW concerns.'

A curb approximately 200mm high has been installed in Area D and aggregate removed.

3. 'The hardstanding, if it used for storage and/or treatment of inert waste in Area C will undergo periodic decompaction as part of its maintenance to achieve the objectives of permissible surface water infiltration (if it used for inert waste storage or treatment).'

Area C is not in use and hardstanding is being replaced with impermeable surface with sealed drainage. Interceptor connection to be determined by DCWW. The area is not in use currently and the connection will be confirmed pending work by DCWW which the Operator is currently awaiting.

ADVICE AND GUIDANCE: As area C is transitioning from a hardstanding to impermeable surface with sealed drainage, given the ongoing works, please ensure run off, mud and debris is managed effectively to prevent illegal discharge beyond the site boundary, and ensure compliance with permitted activities, Table S1.1.

Action: Please provide Natural Resources Wales with an update regarding the progress with the impermeable surface works and work with DCWW re foul sewer connection. Once complete, please also provide a copy of the sites Trade Effluent Discharge consent to Natural Resources Wales.

Due: 30th April 2025

4. 'Staff recruitment exercise to build Technically Competent Manager capacity, with a new member of staff employed on the weighbridge undergoing a trial period and existing staff members being identified to undertake CIWM qualification.'

Action: The Operator has now identified the staff for training and I have requested that the Operator provide evidence of booking the courses be provided via email, once arranged. Please provide a date by which evidence can be provided.

Due: 30th April 2025

5. 'Review of Environmental Management System and updated submission to NRW.'

Action: The Environmental Consultant advised EMS Version 2.2 was ready to be sent over. However, following information that a new building has been recently erected altering the location of the quarantine area, a date was agreed with the Operator's Environmental

Consultant for submission of a revised EMS and FPMP for submission to NRW for review.

In reviewing the EMS, as we have not seen sight of the most recently amended v2.2., please ensure it contains the sites Sampling Plan.

Due: 30th April 2025

Following correspondence between the Operator and Natural Resources Wales following the last Compliance Assessment Report, we briefly explained the requirement for a Notice and in what circumstances a Notice would be utilised. Following the above updates from the Operator and actions agreed, given the progress made, we advised that we do not deem the use of a Notice necessary at this stage.

As we walked around site, regarding the previous infrastructure and general management issues identified, the above improvements were evident, with the resurfacing expected to be completed by April. With only a small section remaining to resurface with impermeable surface.

Site Maintenance

During the walk around of the site, routine inspection and maintenance of the sites drainage infrastructure was discussed. We were advised that the silt trap is emptied once a month and interceptor is inspected monthly and serviced when oil level is reached, with checks occurring daily on the drains. We were also informed the site has also been regraded to adjust for/manage run off.

Trommel fines

In addition to the improvements made, the trommel fines observed on site were discussed in relation to the requirement for a sampling plan. The Operator samples as required to determine waste code classification in line with WM3 and following the inspection, the operator provided a copy as an example showing test results for the sites fines.

Quarantine Area

As identified above, the location change needs to be addressed in a revised EMS and FPMP.

In light of the above, the focus of the next unannounced inspection will be around the Fire Protection and Mitigation Plan, including waste storage/segregation, stockpile dimensions, firebreaks/separation distances, water supply, quarantine/non permitted waste procedure etc.

The visit concluded at approximately 1330 hours.

We wish to thank the Operator and Environmental Consultant for their time during the inspection.

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 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 – Emissions to water, air or 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.

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.