

Compliance Assessment Report CAR_NRW0046549

Permit being assessed: DB3399CE.

For: Bryn Aggregates Limited, **held by:** Bryn Aggregates Limited

At: Gelliargwellt Uchaf Farm, Gelligaer, Hengoed, Caerphilly, CF82 8FY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/02/2025 between 10:00 and 11:00.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Carla Curtis.

Report sent to: Mr. Alun Price / Ms. Jennifer Price, Director / Site Manager & AD Plant Manager, on 12/03/2025.

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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W4B - Waste - 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

This report details the site visit made on the 19th February 2024 to Bryn Aggregates Ltd, permit reference number EPR/DB3399CE. Natural Resources Wales (NRW) Officers Greg GARDNER and Carla Curtis attended Bryn Recycling Limited site for an unannounced site inspection at 10:00am where we met with Mr. Alun PRICE (Bryn Group Director). The weather was dry and windy during the inspection and had rained the previous day.

FIRST SITE INSPECTION

The purpose of this site visit was for NRW regulatory officers to undertake a first site inspection of the newly permitted waste operation where certain topics were to be discussed with the operator.

The topics intended to be discussed as part of the initial site inspection in further detail included:

- How to comply with your environmental permit
- Purpose of an Environmental Management System (EMS)
- Technical competence such as obtaining a WAMITAB certificate
- Frequency and details of waste return submissions
- How compliance scoring affects subsistence fees
- What documents are held on the public register
- The site / operators waste duty of care
- Hazardous waste requirements
- Site infrastructure and maintenance requirements
- Purpose of a Fire Prevention & Mitigation Plan (FPMP)

PERMIT CONDITIONS

The EPR/DB3399CE permit is a Tier 3 bespoke permit for the permanent deposit of inert waste and non-hazardous waste soils to land as a recovery operation. The permitted activities include the recovery of waste only. Activities involving disposal of waste are not allowed. The permit allows the operator to use inert waste and non-hazardous waste soils for the purpose of infilling the quarry and providing a soil formation layer. The maximum quantity of waste to be accepted on site shall not exceed 141,180 tonnes per year. This

permit was issued to the operator on 23/01/25.

GENERAL OBSERVATIONS

Mr. PRICE escorted NRW Officers around the permitted site where quarry operations were taking place. There were no offensive odours and / or excessive noise witnessed by NRW Officers during the site inspection. There was also no excessive dust(s) witnessed by NRW officer at the time of the inspection. Housekeeping standards on site were satisfactory with no issues raised. The site hold a water abstraction licence for quarry operations, with NRW, under permit reference: WA/057/0022/0005.



Photo 1 - View of Bryn Aggregates Quarry



Photo 2 - View of Bryn Aggregates Quarry



Photo 3 - - View of Bryn Aggregates Quarry

MONITORING

The permit sets out monitoring requirements with trigger levels, and reporting requirements for both surface water and groundwater. Please ensure all required monitoring is undertaken on time and in full and results submitted to NRW as per permit frequency requirements to ensure compliance with your environmental permit. These are detailed in schedule 3 and 4 of your environmental permit.

WAMITAB

Ms. Jennifer PRICE holds a current valid WAMITAB (Waste Management Training & Advisory Board) certificate which expires on 05/01/26. The qualification for this current certificate includes:

- AD - Anaerobic Digestion
- LIN - Landfill - Inert Waste

WASTE RETURNS

Waste Return Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

Waste returns must still be submitted to NRW even if it is a null return. Site management need to put in place measures to ensure that the Return data is submitted diligently every quarter. This can be done by setting calendar reminders or having a consultant to submit the business' data. We can escalate breaches if this is a continuing non-compliance.

NRW Officers Greg GARDNER and Carla CURTIS left site at 11.30am the same day.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource 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 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.