

Compliance Assessment Report CAR_NRW0048202

Permit being assessed: KP3636HB.

For: The Recycling Centre EPR/KP3636HB, **held by:** Egan Waste Services Limited

At: Egan Waste Services Recycling Centre Unit A15 Treforest Industrial Estate ,
Pontypridd, CF37 5TA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 11/04/2025 between 10:00 and 12:00.

Parts of permit assessed: 3.3, 2.6.

NRW Lead Officer: Dale Padfield, accompanied by Lewis Evans.

Report sent to: -, Dangerous Goods Safety Advisor , on 16/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.3.3
IR1A - Installations - Management - General Management	C3 Minor	1.1

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR2C	Action 1 – Egan Waste – 2nd May 2025: Egan Waste to develop & implement written procedures for the inspection and maintenance of the filtration system. Please send a copy of the procedure once complete.	31/07/2025

Criteria	Action needed	Complete by
IR3E	Action 2 – Egan Waste – 2nd May 2025: Egan Waste to develop and implement written procedures for undertaking the effluent monitoring requirements listed in the permit. Please submit to NRW for review once complete.	30/06/2025
IR1A	As above - Action 2 – Egan Waste – 2nd May 2025: Egan Waste to develop and implement written procedures for undertaking the effluent monitoring requirements listed in the permit. Please submit to NRW for review once complete.	30/06/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Egan Waste

EPR/KP3636HB

The following Compliance assessment report (CAR) details the following:

- Site inspection undertaken on 11/04/2025
- Review of sampling data submitted for improvement condition program
- Overview of outstanding improvement conditions

Site inspection undertaken on 11/04/2025

A site inspection was undertaken by officers Dale Padfield and Lewis Evans on the 11th of April 2025. The purpose of the visit was to discuss and review the sampling analysis and to re-visit the oily water treatment process and effluent management on the site. The following observations were made:

The oil treatment / separations process was seen in operation, oily water is discharged to the settlement pit, a tube-type 'skimmer' extracts the oil which is then captured in an IBC. When no further oil is seen to be removed by the skimmer and the water appears visibly clear of oil it is then pumped to the storage tanks. From the storage tanks, the water is pumped to a filtration system and is then discharged to the DCWW sewer via an interceptor.

The filtration system had recently been cleaned / renewed, however, it was stated that there are no written procedures detailing the frequency that this is undertaken. As discussed on site, as this forms

part of the 'treatment' process, there should be written procedures detailing the cleaning / media replacement, maintenance checks and frequencies etc. It is advised the manufacturers' guidelines are used to develop the maintenance & inspection regime, but the site may want to consider potential loading on the filtration system based on throughput and include more regular checks to detect any fouling, etc. An action will be issued for written procedures to be created and implemented as part of the EMS. This also applies to the interceptors, it was mentioned these are checked & cleaned, but written procedures should be in place detailing what checks are undertaken and the frequencies checks or maintenance are required.

Action 1 – Egan Waste – 2nd May 2025: Egan Waste to develop & implement written procedures for the inspection and maintenance of the filtration system. Please send a copy of the procedure once complete. **Due 31/07/2025**

The settlement pit should also be subject to integrity inspections to a written procedure, this did not form part of the inspection for this visit but will be form part of a more broader 'containment audit' which will be undertaken at a later date, following completion of the re-surfacing works as per IC 8.

The bund wall repair and overflow pipe replacement (as actioned in CAR_NRW0045221) were seen and completed.

The sample location (Manhole) was seen, as well as the effluent discharge meter. The meter is calibrated annually, as discussed on site, an action will be issued to provide copies of the last two inspections for our records.

During the visit, it was identified that Egan Waste does not have any written procedures for sampling the effluent discharge. As discussed during the visit, the permit requires the operator to use MCERTS personnel, monitoring equipment & techniques to undertake the monitoring requirements of the permit, unless otherwise agreed in writing with NRW. Failing to use MCERTS, as a minimum we would expect operators to be able to demonstrate an equivalent level of quality assurance with their sampling regime. Demonstrating this equivalence can be a fairly onerous task, but generally becomes more onerous when on-site analysis is also undertaken.

When considering the monitoring requirements of the permit, the use of MCERTS or equivalent is a particularly important aspect as it provides NRW with assurance in the quality of the data being reported, and ensures all operators are providing data to the same standard.

If errors or mistakes are made at the sampling stage it may compromise the analysis and invalidate any analytical results. This is why written procedures for undertaking the sampling are an important requirement. It ensures there are prescriptive instructions on how to correctly collect, store, and transport the samples and ensures all various aspects of the sample collection have been assessed and are suitable. Examples of the various errors that can arise can be seen in some of the laboratory analytical results sheets provided by Egan as detailed in the review below.

Failing to undertake the sampling to the required standard is seen as a non-compliance with the permit, specifically permit condition 3.3.3. As discussed on site, when a non-compliance is identified we must score and investigate root-cause, which in this case is seen as the management system failing to

identify the requirement for and implement written procedures detailing the sampling requirements of the permit. In this instance, two minor category 3 non-compliances will be issued. As samples have been taken, the non-compliance is assessed as minor, as the quality of the data reported may not truly reflect the emissions from the installation, leading to the possibility of process control failure or upset going undetected and ELV exceedances not being captured.

Non Compliance: A category 3 minor non-compliance is used for failing to undertake sampling and analysis to the standard required by the permit. Permit condition 3.3.3.

Non Compliance: A category 3 minor non-compliance is used for failing to have written procedures of undertaking the on site monitoring, as would be expected as part of the management system. Permit condition 1.1.

As discussed on site, until written procedures are in place, sampling can be put on hold. As a priority, Egan should now develop written procedures for undertaking the sampling, or consider alternative means of meeting the permit requirement, such as the use of qualified contractors. An action will be issued for this to be undertaken. Below is some advice and guidance on what Egan should consider when developing the procedures:

As a first step you need to consider the following.

BAT sampling requirements: When to sample?

The Waste treatment BATc states that in the case of batch discharges, average values over the release duration taken as flow-proportional composite samples, or, provided that the effluent is appropriately mixed and homogenous, a spot sample taken before discharge. As such, Egan need to establish if the effluent is homogenous to determine what method of sampling would be most appropriate.

Multiple aspects need to be considered when developing the sampling procedure. The procedure should detail the steps taken to ensure the sample is representative, free from contamination, collected in the correct type of container in the correct manner and the correct handling and preservation techniques are not employed were applicable. Ensuring the correct techniques are employed at the sampling stage ensures the integrity of the sample when it arrives at the laboratory for analysis. A written procedure should be developed to cover the monitoring requirement of the permit, the following aspects should be considered when developing the procedure(s):

- Sampling process
- Storage conditions and transport of samples
- Types of bottles or containers and their closures
- Cleaning procedure for each type of bottle, container and closure
- Sample preservation measures
- QA procedures – reviewing analysis etc
- Records for training etc
- Procedure for notification to NRW in the event of a failure / exceedance

The list above is not exhaustive and further information on developing sampling procedures can be found at the environment agencies '**Monitoring discharges to water: guidance on selecting a monitoring approach**' web page – linked [HERE](#). Further information on the specific requirements for sample preservation and transportation can be found in BS EN 5667-3:2024.

Action 2 – Egan Waste – 2nd May 2025: Egan Waste to develop and implement written procedures for undertaking the effluent monitoring requirements listed in the permit. Please submit to NRW for review once complete. **Due 30/06/2025**

Review of sampling data submitted for improvement condition program

Due to the potential implication of the sampling methodology impacting the reliability of the analysis undertaken, we are unable to accept the current data set to support completion of the improvement condition, and will have to re-evaluate when a new data set is available from the more robust sampling and analysis. As such, following implementation of the sampling procedure, all parameters listed within the permit and their associated sampling frequencies will need to be adhered to.

Some further points to consider following review of the submitted data set:

- There was no accreditation associated with multiple aspects of the analysis, 17025 was held for some parameters (Arsenic, cadmium, manganese and mercury) but it is unclear what standard these were analysed to.
- Multiple parameters were subcontracted to alternate laboratories that do not appear to hold any accreditation for the analysis.
- HOI – The reports indicate 'EPH' has been selected for the HOI analysis. The two types of analysis appear to target the same hydrocarbon range, however this should be confirmed for any future analysis.
- Limited data available for the parameters analysed by DCWW, only 4 samples over a 2 year period, unlikely to provide a representative data set for the parameters covered.
- Deviating samples noted in some analysis sheets due to headspace left in sample and inappropriate container material for mercury sample.

Further to the comments above regarding written procedures for sampling, it is also important that the correct accreditation is held by the laboratory for the analysis being undertaken. As mentioned, the permit requires MCERTs, however, it is noted across multiple industries undertaking water analysis that 17025 accreditation is generally accepted. This is providing the laboratory used provides data to the same degree of quality and any analytical methods used are comparable to those mentioned within the permit or BATc.

Once the sampling methodology is complete and NRW are satisfied with its contents, Egan should then resume sampling. The sampling should be undertaken to the frequency stated within the permit, and reported to NRW as specified within the permit. This means that each batch release will need to be analysed, for all parameters, including the routine sweep that DCWW undertake. In the event that DCWW are on site undertaking their routine analysis, Egan can utilise DCWW analysis for the select parameters that cross reference with those in the environment permit (no requirement to duplicate analysis). But if DCWW are not present and a release is made, then all relevant parameters should be included for sampling and analysis that Egan undertake.

Summary for site:

Assess / determine if the effluent is homogenous.

Develop & implement sampling procedures (send to NRW for review).

Begin sampling at the required permit frequency (each batch release for the daily parameters).

Ensure samples are analysed at an accredited laboratory holding the correct accreditation for the required analysis.

Report analysis to NRW at the frequency required in the permit.

Following one year of satisfactory sampling and analysis, providing an adequate data set is available, NRW will review the scope of the monitoring and may agree alternate frequencies for some parameters should this be justified with sound evidence, inline with improvement condition 7. Furthermore, IC 7 & 9 will then also be assessed.

Outstanding Improvement conditions

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IC 1 – This relates to the Sites FPMP. Egan have submitted their FPMP, included updated and amended version (2.23). IC 1 is considered complete. This will be audited at a later date.

IC 4 – Partly relates to monitoring of effluent and descriptions / process flow diagrams of treatment process. Effluent monitoring is now subject to the actions above and will be on-going before completion of this IC. Egan have submitted a process flow diagram ‘Residue management – pretreatment of oily water and dewatering’, which includes a simplified process of the oil removal. However, the diagram doesn’t depict some aspects of the process, such as the filtration step and interceptor and discharge to sewer. These aspect should be included, or a separate process flow created to show the oily water treatment in full.

Action:

IC 7 – Effluent monitoring on-going – subject to sampling procedure improvements.

IC 8 – This IC relates to the re-surfacing works, to ensure the site is subject to complete impermeable surface. An on-going action for completion by June 30th. This will require evidence in the form of sign-off by a qualified engineer to show the standard is equivalent to the requirements of CIRIA 736.

A second part of this IC covers design and maintenance provisions for leak detection and repair, we will look at this following completion of the re-surfacing works.

IC 9 – Awaiting sampling data for conformation that BAT AELS are achieved. Treatment techniques will be reviewed in more detail at a later date.

IC 12 – This relates to the release of any priority hazardous substances. No evidence to support this IC has been submitted.

Egan will need to review the requirements of this IC and provide the information requested. The list of priority hazardous substances should be reviewed and an evaluation of the substances to include within any analysis should be based on the potential parameters present within the waste inputs. Parameters should only be discounted where there is certainty they will not be present within any of the input waste.

For instance, lubricating oils often contain ‘hidden’ species such as naphthalene, BTEX, phenols, xylene and copper, all of which are listed as priority hazardous substances. Egan should assess the list of priority hazardous substances and include any parameter that has potential to be present and include these in the assessment.

This IC should be completed following implementation of the sampling procedures.

Other points discussed during the site visit

Other points of discussion focused on waste EWC coding for both in-coming and out-going wastes. As highlighted during the discussion, an initial review of the waste returns data has highlighted some potential coding issues. As discussed, this will form the basis of a separate audit topic, where we will look to identify where the issues are and provide some advice and guidance to restore compliance.

Summary

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I’ve provided the short summary below, this is to provide an overview of the outstanding actions, and the intended timeline / order in which we will address / review and action some of the topics highlighted in the CAR. Please note that the timings are indicative and subject to change and are only

intended to provide a guide.

Outstanding action / IC / compliance topic	Due date or intended timeframe for review & action
Develop & Implement sampling procedures – Send to NRW for review when complete.	30/06/2025
Develop & implement written procedures for the inspection and maintenance of the filtration system	31/07/2025
Begin sampling as per permit requirements following completion and implementation of sampling procedures.	July / August 2025
EWC coding & Waste Audit	August 2025
IC 12 – undertake assessment as required by IC 12	October 2025
IC 8 review & containment audit	Q1 2026 (March)
IC 9 / IC 7 / IC 4 – review sampling data and assess sampling frequencies.	Q2 2026
FPMP audit	Q4 2026

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.