

Compliance Assessment Report CAR_NRW0048754

Permit being assessed: PP3430UL.

For: Bridgend Clinical Waste Treatment Plant and Transfer Station, **held by:** SRCL Limited

At: S R C L Ltd, Unit 12, Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Brynmenyn, Bridgend, Bridgend, CF32 9SZ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 03/07/2025 between 10:00 and 12:00.

Parts of permit assessed: Various.

NRW Lead Officer: Greg Gardner, accompanied by Mostyn Wall.

Report sent to: Mr. Stephen SIMMS, Regional Manager, on 15/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR4B - Installations - Information - Reporting	Action only (X)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	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
IR3I	Review and update sites FPMP document in relation to fire breaks and site drainage cover identification. Once updated, please send revised FPMP to your regulating Officer for review.	01/09/2025
IR2C	Please ensure the operating techniques section of your permit, when varying, includes the process of removing metal waste(s) from treated flock as per your recently conducted trial (CAR_NRW0048297).	01/07/2030
IR4B	Resubmit last 4 waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly	29/08/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 3rd July 2025 to at the SRCL Ltd site, permit reference number EPR/PP3430UL.

Natural Resources Wales (NRW) Senior Officer Greg GARDNER and Lead Specialist Mostyn WALL attended the SRCL Ltd Site, 12 Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Bridgend, CF32 9SZ for a planned routine site inspection at 10:00pm where they were met with SRCL Ltd Management. The site was operational where the weather was dry, sunny and warm at the time of the inspection.

GENERAL OBSERVATIONS

The purpose of the visit was to conduct a site handover from Officer WALL to Officer GARDNER and to become familiar with the sites operations, process and surroundings. Discussions took place regarding current site operations and future intentions such as any planned maintenance / business expansion. Site Management walked NRW Officers through the process (Photo1) where it was noted that there were no offensive odours witnessed both

inside and outside the permitted boundary and / or excessive noise / dust witnessed. Housekeeping on site was maintained to a good standard with little to no evidence of excess debris present.



Photo 1 - On site treatment of medical waste(s) at SRCL Ltd

TRIAL

SRCL Ltd conducted a 7 day trial which saw the temporary installation of a magnet separator (Photo 2) on the exit conveyor of the treatment plant to allow the extraction of ferrous metals from the treated waste flock (see CAR Form - CAR_NRW0048297 for further information). Discussions with SRCL Ltd Management indicated that the trial was successful and the site are looking to install this as a permanent feature of their operations.

A change in operating techniques, in which this is applicable, would require a permit variation to ensure that the permit reflects the current operations on site, however, since this improvement is for the betterment of the sites operations and the fact that no extra emissions would be encountered and of a minimal risk to the environment, NRW are content with SRCL Ltd waiting until a more substantial variation of their EPR/PP3430UL permit is required to update the operating techniques and incorporate this new process.



Photo 2 - Removed magnet separator which would sit on exit of line following treatment of waste(s)

ACTION ONLY – PERMIT CONDITION 2.3.1(a)

(IR2C) – OPERATING TECHNIQUES

"The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales."

- Please ensure the operating techniques section of your permit, when varying, includes the process of removing metal waste(s) from treated flock as per your recently conducted trial (CAR_NRW0048297).

ACTION: Please ensure the operating techniques section of your permit, when varying, includes the process of removing metal waste(s) from treated flock as per your recently conducted trial (CAR_NRW0048297).

FPMP (FIRE PREVENTION AND MITIGATION PLAN)

Whilst outside and walking around the site, NRW Officers noticed improvement measures have been installed regarding fire water run off with a recently installed concrete bund located around the perimeter of the site as well as a raised lip at the site entrance (Photo 3 and 4). In the event of a potential fire, any water run off would be retained on site with clay drain covers available as well as drain lock offs to prevent any emissions to surface water off site.



Photo 3 - Newly installed concrete bund around perimeter of site



Photo 4 - Raised lip at entrance to site

It was noted by NRW Officers there were numerous yellow clinical waste bin(s) present at the rear of the site. Whilst they were of no immediate concern, a potential issue was raised regarding insufficient fire breaks due to the amount present at the time with the potential for more bins to be present. In the unlikely event of a potential fire, access for the SWFRS (South Wales Fire and Rescue Service) to conduct firefighting would become restricted. It is recommended that a review of the sites FPMP document, particularly under section 2.7.1 (Generic Management Control - Waste Storage) referencing that sufficient fire breaks, particularly outside, should be in place and any surface water drains within the vicinity are marked / labelled up so drain covers can be placed effectively to prevent any rogue emissions to water from site.



Photo 5 - Medical waste bins located outside at rear of SRCL Ltd building

ACTION: Review and update sites FPMP document in relation to fire breaks and site drainage cover identification. Once updated, please send revised FPMP to your regulating Officer for review.

ACTION ONLY – PERMIT CONDITION 3.7.1

(IR3I) – FIRE

"The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance."

- Review and update sites FPMP document in relation to fire breaks and site drainage cover identification. Once updated, please send revised FPMP to your regulating Officer for review.

WASTE RETURN SUBMISSIONS

It has come to the attention of NRW that the last 4 waste return submissions, whilst submitted on time and in full, are not in the correct format where the data is not compatible with NRW systems. The site have been made aware by NRW's waste submissions team on all 4 occasions of this issue. Continuation of this may result in NRW considering it's enforcement response. NRW will supply the latest spreadsheet template for the operator to complete and re-submit the information to the NRW Waste Returns Team.

Please be aware that it is a condition of your permit to supply timely returns in an acceptable format and gaps in compliance history can cause complications if/when permits are transferred/surrendered and possibly cost implications during the life of the permit. Please amend and resubmit all outstanding returns in an acceptable format as per permit. The latest waste returns spreadsheet document will be sent to the operator along with this CAR form.

ACTION ONLY – PERMIT CONDITION 4.2.5

	(IR4B) – REPORTING <i>"Within 1 month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter."</i> • Resubmit last 4 waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly ACTION: Resubmit last 4 waste returns to NRW on NRW provided waste return document to ensure all the data is submitted correctly <i>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</i> END.	
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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.