Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0049038

Permit being assessed: BP1772IZ.

For: Poeton Cardiff, **held by:** Poeton (Cardiff) Limited

At: Poeton (Cardiff) Ltd, 283 Penarth Road, Cardiff, Cardiff, CF11 8UL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 10/07/2025 between 10:00 and 11:30.

Parts of permit assessed: 2.3.3, 3.1.2, 2.2.1, 4.2.3.

NRW Lead Officer: Dale Padfield.

Report sent to: -, HSE & Facilities Manager, on 04/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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
IR1A	Action 1 - Poeton to ensure all level control switches for process tank immersion heaters are included on the planned preventative maintenance schedule. Ensuring functionality checks are conducted and recorded. Please provide NRW with conformation this has been completed.	31/10/2025
IR1A	Action 2 - Poeton to establish and record the routing of all site drains and subsurface pipework and include a detailed drainage plan within the sites EMS. Provide NRW with a copy once complete.	31/01/2026
IR1A	Action 3 - Following completion of Action 2, Poeton should implement an inspection routine to assess any subsurface pipework and drainage to ensure it remains leak free and suitable for use. The inspection should form part of the sites planned preventative maintenance regime, and be scheduled at appropriate intervals. Any defective pipework or drainage detected during the inspections, which may pose a risk of pollution, should be scheduled for repair without delay. Provide NRW with details of the PPM regime for subsurface pipework and drainage once implemented and a copy of any inspection reports once undertaken.	31/01/2026

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

Poeton (Cardiff) Limited

EPR/BP1772IZ

This Compliance assessment report details the following:

- Site inspection undertaken on the 10th of July 2025
- Bi annual sewer discharge (S1) returns for January – June 2025
- Action from CAR_NRW0046221

Site Inspection

A site inspection was undertaken on the 10th July 2025 to assess various aspects of the installation, the following provides an overview.

Effluent treatment plant (ETP) updates – The site has recently submitted a permit variation application to NRW to cover the proposed changes and improvements being made to the ETP. New infrastructure, including pipework and tanks and bunding was seen during the visit, the upgrade is a welcomed improvement on the current ETP. The bund walls benefited from a resistant coating. Poeton advised that several of the ETP associated sumps have now been back-filled, including the sump that was identified as having some damage / defects. All sumps have been reduced in size and now benefit from double skinned plastic liners. This is an excellent improvement which should reduce the risk of leakage considerably.

All new pipework associated with the new ETP will be double skinned and above ground which would be deemed BAT and is again a welcomed improvement. The pH alarm probe has be re-positioned and now sits within the neutralisation tank, which is providing a better indication and better control over the neutralisation of the effluent (the previous position was resulting in high pH swing due to the non-homogeneous nature of the influent) .

The on site laboratory was seen, Poeton has recently invested in a MP-AES instrument allowing for in-house effluent analysis. Currently, all effluent samples are transferred to the sister site in Gloucester. On-site capability to conduct analysis will provide faster detection of any issues and therefore reduce the response time for mitigation measures. Poeton stated that on-going duplicate analysis is being conducted to provide assurance that the on-site analysis is providing comparable results to those obtained in Gloucester.

As discussed on site, If Poeton are content that the on-site analysis is providing accurate analysis, then the on-site MP-AES instrument can be used for the weekly effluent analysis. Poeton will need to ensure any relevant procedures or aspects of the EMS are updated accordingly. Further to this, as discussed on site, NRW will be conducting an Operator Monitoring Assessment (OMA) later this year. This is how NRW assess the quality and reliability of the monitoring undertaken for permit compliance. A document pack has been emailed to the operator and we will look to schedule the OMA later in the year (2025).

Hazardous waste / Chemical storage – The chemical and hazardous waste storage areas were inspected. The chemical inventory is primarily stored within large lockable containers situated within a large covered bunded area. The area appeared well maintained . The bund benefits from a sump, which is inspected annually via visual and leak check. The bund and storage facilities also benefit from an annual integrity inspection. If not already, Poeton should ensure that these checks are recorded and there's a procedure detailing the checking process.

Stores are kept locked, the alkali store was opened, all containers were correctly labelled and neatly stored. The Cyanide is stored separately, the store was seen and the cyanide seen to be secure. Limited access is available to this store.

Internal processing areas were inspected. The newly installed ‘dead-mans’ handles were seen to be installed on all tank top-up facilities.

Fire prevention was discussed, some process tanks are heated via immersion heaters. The heaters are controlled by a level control switch. As discussed on site, Poeton should ensure that the level control switches are included on a planned preventative maintenance schedule with checks undertaken at appropriate interval to ensure the switches remain operational. Similar facilities have suffered catastrophic fires which were a result of immersion heated within plastic tanks remaining ‘on’ following the tanks being emptied. Poeton are in the process of installing thermal CCTV within all process areas, which will aid in early detection of fire.

Action 1 - Poeton 4th August 2025: Poeton to ensure all level control switches for process tank immersion heaters are included on the planned preventative maintenance schedule. Ensuring functionality checks are conducted and recorded. Please provide NRW with conformation this has been completed. **Due 31st October 2025.**

Site drainage arrangements were discussed, which highlighted some aspects which could be improved. Some external drainage for surface and roof water was observed, Poeton believe these drain direct to the surface water drainage network on the industrial estate. Having reviewed drainage maps of the area, there are both foul and surface water drainage lines running along Penarth Road. Poeton should Identify where the sites surface water is discharged, the surface water line may provide a direct pathway to the environment should inventory or waste escape to the surface water drain during an event or incident. The site’s EMS should contain a site plan, which should in turn should provide sufficient detail on the sites drainage. All site drains and subsurface pipework should be detailed, including all internal and external and both effluent and surface water drainage lines and with detail where the drains discharge pipework connects etc.

Further to the above, subsurface pipework and drainage should be engineered to minimise leaks and have a means of swift detection if leaks do occur. Poeton were unsure on the construction materials etc of the subsurface drainage lines and unsure when they were last inspected for their integrity. As such, the following actions will be issued:

Action 2 - Poeton 4th August 2025: Poeton to establish and record the routing of all site drains and subsurface pipework and include a detailed drainage plan within the sites EMS. Provide NRW with a copy once complete. **Due 31/01/2026**

Action 3 - Poeton 4th August 2025: Following completion of Action 2, Poeton should implement an inspection routine to assess any subsurface pipework and drainage to ensure it remains leak free and suitable for use. The inspection should form part of the sites planned preventative maintenance regime, and be scheduled at appropriate intervals. Any defective pipework or drainage detected during the inspections, which may pose a risk of pollution, should be scheduled for repair without delay. Provide NRW with details of the PPM regime for subsurface pipework and drainage once implemented and a copy of any inspection reports once undertaken. **Due 31/01/2026**

Drains should also be easily identifiable, most sites use a colour coding system, with red indicating effluent drainage and blue indicating surface water. Having drains easily identifiable can help mitigate loss during an incident such as chemical spill or firewater generated during a fire. The sites accident management plan (AMP) should also have procedures to ensure surface water drainage is protected during such incidents, with drain blockers / covers to prevent liquids escaping.

Recommendation: Poeton should ensure that procedures are in place within the sites AMP to prevent spills entering any surface water drains. It's also recommended that the site investigates the likely fate of firewater should a fire incident occur. This could help mitigate any potential off-site impact should such an event occur. NRW will look at the AMP in more detail in due course, and it will likely be a compliance topic during 2026.

Hazardous waste consignments – The two most recent hazardous waste consignment notes were requested to assess compliance with permit condition 2.3.3.

Consignment notes - POETON/49736 POETON/50595: All assigned EWC codes and hazard statements appear correct for the described wastes. The majority of wastes have been assigned chapter 11 codes, reflecting the nature of the process where the assets have originated, where an unavailable code is available within this chapter, relevant codes from other chapters have been used, such as chapter 6 – wastes from inorganic chemical processes.

Two wastes were chosen at random to check the assigned hazard statements. Sodium Cyanide – provided with hazard statements HP5, HP6 and HP14 – which described the wastes as 'Specific target Organ Toxicity' (STOT), Acute Toxicity, and Ecotoxic respectively. Following the assessment in WM3 and hazard statement codes provided in the GBMCL list, all hazard statements have been assigned and are correct.

'Ardrox 1704' – Has hazardous properties listed as HP 8 on the consignment note. WM3 lists two hazard statements for Orthophosphoric acid (with hazard statement H314) as HP4 and HP8. Following the decision assessment in WM3, HP4 is not applicable and therefore only HP8 applies. Therefore, all hazard statements have been assigned and are correct.

Actions from CAR_NRW0046221

Two actions were issued in relation to a spill of chromatic acid which the ETP was unable to mitigate in its entirety. As a repose, Poeton have installed 'dead mans' triggers on the top up facilities and introduced a new procedure with staff undergoing refresher training. The actions from CAR_NRW0043221 are considered complete.

S1 Bi-annual returns January – June 2025

All parameters are within their respective ELVs over the reporting period. The returns are accepted.

Overall the site has seen significant improvements in effluent plant control, which is evident in the latest S1 reporting returns. The investment in new infrastructure at site to benefit environmental outcomes is evident and is welcomed by NRW.

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.