

Compliance Assessment Report CAR_NRW0049404

Permit being assessed: LP3439HM.

For: Roath Dock Treatment and Recycling Centre NRW/EPR/LP3439HM/V003, **held by:** Castle Waste Services Limited

At: Roath Dock Transfer Station Old Clipper Road , Roath Dock, Cardiff, CF10 4LX.

Type of assessment: Audit,

Reason: Routine.

On: 07/08/2025 between 09:00 and 14:00.

Parts of permit assessed: 1.1, 3.1.2, 3.5, 4.2.1, 4.3.1.

NRW Lead Officer: Dale Padfield, accompanied by Brigid Armstead.

Report sent to: -, CEO, on 16/09/2025.

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)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.2.1

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(1)	Action 1: Please provide details of the investigation into the elevated lead concentrations. Action 2: Please provide clarification on why the pre-discharge sample failed to detect the elevated lead	30/11/2025

Criteria	Action needed	Complete by
	concentrations prior to discharge.	

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

Castle Waste Services Ltd

EPR/LP3439HM

This Compliance assessment report details the following;

- Operator Monitoring Assessment (OMA)
- Q2 2025 Waste returns
- Q2 2025 Monitoring returns

Operator Monitoring Assessment (OMA)

On the 07th of August 2025 officers Dale Padfield and Brigid Armstead undertook an OMA at the Castle facility. OMA assessments are used to assess the quality and reliability of monitoring undertaken at sites by both the operator and contractors. Castle scored well during this OMA, with a score of 90%. There was a single very poor score related OMA 3G, due to a procedural gap related to the breakdown response for the effluent flow meter. Having identified this gap, Castle are in the process of identifying a suitable contract.

Some further recommendations are made within the report, these primarily relate to having more robust documentation for aspects which are already in place. Castle should take these into consideration, however, there are no concerns with the management, quality or reliability of data captured by the installation. The full OMA report can be found as an attachment to this compliance assessment report (CAR).

Q2 (January – March 2025) Waste returns

Returns submitted within the reporting window. All EWC codes were compliant with the permit, including no acceptance of the voluntary prohibited EWC codes listed in CAR_NRW0039332. The returns are accepted.

Q1 (January – March 2025) Monitoring returns

All parameters were within consent limits with the exception of lead and hexavalent chromium. A result of 1.64 mg/l was received for hexavalent chromium for the sample taken on the 09/06/2025, however, as with previous exceedances of hexavalent chromium, this was a false high result likely caused by interference during analysis. The same sample gave a result of 0.018mg/l for total chromium, well within the hexavalent chromium ELV. As such, no non-compliance will be issued for the apparent exceedance.

A result of 0.896 mg/l was received for lead for a sample taken on the 10/04/2025. A Schedule 5 notification was received detailing the exceedance on the 31/07/2025. The notification identifies the exceedance as being the result of a single batch and states an investigation into the elevated value was undertaken. In response, Castle increased the monitoring frequency of batch discharge to include a sample of every batch discharge to be sent for third party UKAS laboratory analysis, and no further exceedances have been observed.

The notification states that increased concentration was below the trade effluent consent limit (2 mg/l) and a permissible effluent volume limit of 400 m³ within 24 hours, with the batch discharging a total of 107 m³. As such, Castle have stated that the total loading is well within Dwr Cymru Welsh Water (DCWW) treatment plant capacity and therefore should not cause an environmental issue. However, the recorded concentration does exceed the permitted ELV. Additionally, any lead within the effluent received at the DCWW treatment works isn't truly abatement, but removed from the liquid fraction and transferred into the 'sludge'. This means that additional quantities of lead that were released will ultimately be destined for release into the environment. As such, this has been assessed as a minor category 3 non-compliance.

Non-compliance: A category 3 minor non-compliance is issued for exceeding the permitted ELV for lead. Permit condition 3.1.2.

Action 1: Castle Waste Services 16/09/2025: Please provide details of the investigation into the elevated lead concentrations. **Due 30/11/2025**

Within Castles 'Trade effluent discharge procedure' (2.4.3.2) under the 'principles' section is the following statement:

"Effluent is discharged on a continuous basis; it is essential that the contents of the tank undergo suitable sampling and analysis to ensure the effluent satisfies the terms of Trade Effluent Agreement. Effluent may only be authorised for discharge by the Site Manager or Process Manager (or technically competent nominated deputy in their absence).

Authorisation requires that the pre-discharge sample is analysed and that parameters meet the consent requirements. In the event this is not the case the effluent will not be authorised for

discharge.”

Action 2: Castle Waste Services 16/09/2025: Please provide clarification on why the pre-discharge sample failed to detect the elevated lead concentrations prior to discharge. **Due 30/11/2025**

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.