

Compliance Assessment Report CAR_NRW0049846

Permit being assessed: YP3937SH.

For: Amex Park, **held by:** Mekatek Limited

At: Llanstephan Road, Johnstown, SA31 3NF.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2509736).

On: 03/11/2025 between 09:25 and 10:05.

Parts of permit assessed: General Management, Emissions and Monitoring.

NRW Lead Officer: Alex Bowder, accompanied by Elliot Jones.

Report sent to: Mekatek Limited, Technical and Compliance Director, on 04/11/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3I - Installations - Emissions and monitoring - Fire	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2

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)	Provide NRW with the laboratory analysis results for the firewater captured in Tank 4 of the ETP.	18/11/2025
IR3I	Conduct an investigation into the cause of the fire and submit	04/12/2025

Criteria	Action needed	Complete by
	a summary of findings to NRW.	
IR1A	Review the current Fire Prevention and Mitigation Plan (QP84) to ensure it reflects the latest NRW guidance, particularly regarding the storage and management of lithium and lithium-ion batteries.	04/02/2026
IR3A(2)	There will be no further unauthorised emissions to air from smoke release.	04/11/2025

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

**Reissued CAR to amend technical wording in Section 5 - FPMP.*

Site: Amex Park, Llansteffan Road, Johnstown, Carmarthen, SA31 3NF

Operator: Mekatek Ltd

Permit Reference: EPR/YP3937SH

Date of Inspection: 3 November 2025

1. Introduction

This Compliance Assessment Report summarises the observations and findings of Natural Resources Wales (NRW) Officers following a site inspection conducted in response to a waste fire incident that occurred on 2 November 2025 at the premises of Mekatek Ltd, Amex Park, Llansteffan Road, Johnstown, Carmarthen.

The purpose of the inspection was to assess the extent of the fire, verify the management of firewater, and ensure that emissions resulting from the incident were effectively controlled to prevent environmental harm.

Attendees

- **Alex Bowder**, Senior Regulation Officer - NRW
- **Elliot Jones**, Senior Regulation Officer - NRW
- Technical and Compliance Director - Mekatek Ltd

2. Fire Incident - 2 November 2025

At approximately 12:26pm on Sunday afternoon, the operator's staff were alerted via remote monitoring that heat detection alarms had been activated within the transfer station building. The site was unmanned at the time. CCTV footage confirmed the presence of a fire, prompting staff to contact the Fire and Rescue Service (FRS) via a 999 call.

Upon arrival, the FRS gained access to the site by forcing entry through a door to the transfer station building. The fire was contained within one of the brick fire break bays, which was being used to store approximately 7 tonnes of lithium batteries housed in plastic containers. Water was used as the primary extinguishing agent; no foam was applied.

Following extinguishment, and on the advice of the FRS, the fire-affected material was relocated from the building to an open area of the yard. This area is surfaced with impermeable concrete and benefits from sealed drainage infrastructure (see Image 1). The FRS continued to cool the material using fire hoses and maintained a fire watch to monitor for potential reignition.

All firewater generated during the incident was captured by the sealed drainage system and directed to Tank 4 of the site's Effluent Treatment Plant (ETP). Smoke emissions were produced during the fire, largely contained within the building, although some escaped when doors were opened to allow access.

Due to uncertainty regarding the volume of water required to extinguish the fire, the operator chose not to isolate the transfer station interceptor. Instead, firewater was routed via the drainage network to Tank 4, in accordance with the site's Emergency Action Plan. The intention was to sample and assess the firewater to determine whether it could be treated via the ETP and discharged as final effluent.

NRW's Incident Communication Centre (ICC) were notified of the incident via the FRS Control Room at 3:50pm. The FRS departed the site at approximately 4:30pm and provided a completed incident handover sheet to the operator. NRW out-of-hours staff attended the site at 6:10pm to assess the extent of the incident, confirm environmental containment, and verify that firewater and emissions posed no immediate pollution risk or threat of reignition.



Image 1 - Taken at 18:16 on 2 November 2025, showing fire-affected materials relocated from the transfer station and stored on an impermeable surface within the yard.

3. NRW Site Inspection - 3 November 2025

NRW Officers A Bowder and E Jones arrived on site at 9:25am to conduct a follow-up investigation into the fire incident that occurred on 2 November 2025. Upon arrival, they signed in at the site office and were met by the operator's Compliance Director.

Following an office-based summary of the incident, officers queried whether the ignition source had been identified and whether any emissions to land or water had occurred as a result of the smoke or firewater used during firefighting operations.

The operator explained that the fire was contained within the transfer station unit and that all firewater used to extinguish the blaze was captured via the impermeable surface and sealed drainage system. Smoke generated during the incident was largely contained within the building; however, some escaped when the doors were opened to allow access for the FRS.

The operator provided a copy of the FRS incident handover form, which documented the fire response and site handover (see Image 2).

FFURFLEN DROSSLWYDDO DIGWYDDIAD / INCIDENT HANDOVER FORM	
PEIDIWCH Â DEFNYDDIO TALFYRIADAU NEU DERMINOLEG GWASANAETH TÂN / DO NOT USE ABBREVIATIONS OR FIRE SERVICE TERMINOLOGY	
Rhif y Digwyddiad / Incident Number	053047
Cyfeiriad, Cod Post, Cyfeirnod Map / Address, Postcode, Map Reference	Amex Park, Old Han Steffan Road, Carmarthen, SA31 3NF
Math o Ddigwyddiad / Incident Type	Industrial fire
Ardal a Effeithiwyd / Affected Areas	WAREHOUSE
Peryglon sy'n parhau ar y safle (gweler yr allwedd dros y ddalen) / Hazards remaining on site (see key overleaf)	
Peryglon / Hazards	Mesurau diogelwch dal mewn lle / Safety measures left in place
BATTERIES - RE-IGNITION TOXIC SMOKE WATER RUN OFF ELECTRIC ISOLATED SLIPS, TRIPS + FALLS	REMOVE FROM ANY FLAMMABLE + COMBUSTIBLE PRODUCTS AWAY FROM BUILDINGS MONITOR FOR ANY RE-IGNITION ELECTRICIAN TO CHECK BEFORE TURNED ON MONITOR ANY WASTE WATER IS CONTAINED ON SITE
Unrhyw wybodaeth berthnasol arall Any other relevant information	Materion Diogelu'r Amgylchedd - Mesurau Diogelwch Environmental protection Issues - Safety Measures
CONTACT FRS FOR ANY RE-IGNITIONS	NRW INFORMED - ALL WATER CONTAINED BY ON SITE INTERCEPTORS
Rhagdybir presenoldeb pellach / Anticipated further attendance	Manylion cyswilt y Gwasanaeth Tân / Fire Service contact details
NO.	0370 6060699
<p>Mae'r cyngor/cyfarwyddiadau hyn mor fanwl â phosib, cyhyd â bod y cychwynnydd yn ymwybodol. Fodd bynnag, gall peryglon eraill fodoli ac mae'n rhaid i'r person sy'n derbyn rheolaeth gyflawni'i asesiad ei hun o'r sefyllfa.</p> <p>The guidance / instructions are provided as detailed as possible, as far as the originator is aware. However, other hazards may exist and the person accepting control must make their own assessment of the situation.</p>	
Rwyf i _____ (Argraffwch eich enw) yn cadarnhau fy mod wedi darllen a deall y wybodaeth uchod ac yn derbyn rheolaeth o'r adeilad/safle.	I <u>DAU LEWIS</u> (Please print name) confirm that I have read and understood the above information and accept control of the premises/site.
Llofnod _____ Dyddiad ac Amser _____	Signature _____ Date & Time <u>2/11/25 -</u>
Pennaeth Digwyddiad _____ Llofnod _____	Incident Commander <u>NICK REES</u> Signature <u>AJ 892</u>
	COMPLIANCE DIRECTOR.

Image 2: Copy of the FRS incident handover form provided to the operator following the fire response.

NRW officers proceeded to inspect the transfer station area and observed the fire-affected material that had been relocated to the yard, as shown in Image 4. The fire had been contained within a single storage bay inside the transfer station building. At the time of inspection, the bay had been cleared of all material, and the slot drain - previously pumped appeared to be unblocked. The building is equipped with fire-retardant roofing, which showed no visible damage. Scorch marks were present on one wall of the containment bay, but structural damage was limited to that area.

The operator discussed potential challenges regarding the classification and consignment of the fire-affected material for onward transfer, including the appropriate completion of waste transfer documentation.

4. Firewater Management

Captured firewater from the incident was directed via the site's sealed drainage network into Tank 4 of the ETP. NRW officers viewed Tank 4 from a distance and discussed with the operator the intended approach for treatment and disposal of the collected firewater.

The operator confirmed that the firewater will be tested for heavy metals to determine whether it can be processed through the ETP and treated via the Dissolved Air Flotation (DAF) system, in preparation for final effluent discharge. The operator has committed to conducting additional monitoring to ensure that all discharges remain compliant with the site's permitted Emission Limit Values (ELVs). NRW expects this action to be completed and documented.

The operator also stated that CCTV footage of the incident will be reviewed, and findings shared with NRW to assist in identifying the possible ignition source.

The Fire and Rescue Service (FRS) commented positively on the operator's site procedures, noting that water emissions from the fire were effectively contained.





Images 3 and 4, taken at 9:45am on 3 November 2025, showing the containment bay within the transfer station building where the fire originated, and the fire-affected material relocated outside the unit and stored on an impermeable surface equipped with sealed drainage.

5. Fire Prevention and Mitigation Plan (FPMP)

The operator's Fire Prevention and Mitigation Plan (FPMP), referenced as **QP84 - Mekatek Limited, Carmarthen Site**, outlines procedures for the storage and handling of batteries. The relevant section of the document states:

"Batteries are stored in appropriate transit receptacles according to the regulations. Lithium and lithium ion batteries are to have their terminals wrapped with insulating tape if exposed before being stored in plastic drums. All battery bulk up drums must be clean, dry and in good condition. Additional packaging material may be added to full drums to prevent the batteries moving during transport. Full drums are lidded and sealed."

In comparison, NRW's Fire Prevention and Mitigation guidance for lithium and lithium-ion batteries includes the following requirements:

"You must store batteries separately from other waste streams. You must store them in a way that prevents them from coming into contact with any liquids or being damaged. Quarantine and store any damaged lithium batteries away from buildings and other combustible materials. You must store them in a suitable, robust, waterproof container filled with sand or similar inert material. You must ensure non-permitted or damaged Lithium batteries are removed from site for appropriate disposal or recycling as soon as practicable."

NRW reminds the operator of the importance of aligning site practices with the above guidance.

Particular attention should be given to:

- Segregation of battery types, especially lithium and Li-ion batteries
- Prevention of exposure to liquids and physical damage
- Quarantine and safe storage of damaged batteries
- Use of inert containment materials where appropriate
- Timely removal of non-compliant or damaged batteries from site.

Please ensure these requirements are upheld consistently going forward.

Time off site: 10:05am

6. Compliance and required actions

While firewater generated during the incident was effectively contained within the site's sealed drainage system, **unauthorised emissions to air** occurred due to smoke released during the combustion of lithium batteries and the plastic containers housing them. These emissions had the potential to cause environmental pollution, given the nature and composition of the materials involved.

In accordance with NRW's compliance scoring guidance, a non-compliance score of **C3** has been recorded against sub-criteria **IR3A (2)**.

C3 PERMIT BREACH	IR3A (2) - Emissions and monitoring
<p>Condition 3.1.2: <i>"Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution...[]"</i></p>	

In response to the fire incident the operator is required to undertake the following actions:

1. **Provide NRW with the laboratory analysis results for the firewater captured in Tank 4 of the ETP.**
This will inform whether the material can be treated and discharged in accordance with the site's permit conditions.
2. **Conduct an investigation into the cause of the fire and submit a summary of findings to NRW.**
This should include any relevant CCTV footage, operational records, and contributing factors identified.
3. **Review the current Fire Prevention and Mitigation Plan (QP84) to ensure it reflects the latest NRW guidance, particularly regarding the storage and management of lithium and lithium-ion batteries.**
Any updates should be submitted to NRW for review.

Report Compiled By:

Alex Bowder

Senior Officer - Southwest Wales Industry Regulation

Email: Alex.Bowder@cyfoethnaturiolcymru.gov.uk

END OF REPORT

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.