

Compliance Assessment Report CAR_NRW0050044

Permit being assessed: BP3599SZ.

For: The Waste Transfer Station, **held by:** Nolan Recycling Ltd

At: Pyle, Stormy Down, Bridgend, Glamorgan, CF33 4RS.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2505754).

On: 19/06/2025 between 15:30 and 16:30.

Parts of permit assessed: W1A, W1A, W3G.

NRW Lead Officer: Elysia Lovelock, accompanied by Alex Grabham.

Report sent to: Emma Cull , Sites Technically Competent Manager, on 02/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3G - Waste - Emissions and monitoring - Fire	Action only (X)	
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1
W1A - Waste - Management - General management	C3 Minor	1.1.1.

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
W3G	Following the incident, please provide a copy of the sites Investigation Report detailing the Operators findings. ACTION DUE: Please provide a copy of the report within 10 working days of receipt of this Compliance Assessment Report.	16/12/2025

Criteria	Action needed	Complete by
W2C	Please review the sites FPMP in conjunction with all relevant appendices, including the sites current drainage plan, and drainage survey undertaken following the fire, and provide the revised/amended FPMP to NRW for review. And ensure, any revised FPMP is adhered to onsite. I note the version of the FPMP at the time of the fire was v1.4 310721. ACTION DUE: Please provide of a date to be agreed with NRW within 10 working days of receipt of this Compliance Assessment Report, for submission of a revised FPMP.	16/12/2025
W1A	Please review the Environmental Management System for the site, incl. risk assessments, procedures and infrastructure to ensure they provide the necessary environmental protection and provide an updated EMS to NRW as required. ACTION DUE: Please provide of a date to be agreed with NRW within 10 working days of receipt of this Compliance Assessment Report for submission of a revised EMS.	16/12/2025

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 Compliance Assessment Report acknowledges that there has been a significant delay by Natural Resources Wales in issuing this report, due to unforeseen circumstances following the visit and we thank you for your patience.

On 19th June 2025, Senior Industry and Waste Regulation Officer Elysia Lovelock and Environment Officer Alex Grabham of Natural Resources (Body for) Wales attended the permitted Waste Transfer Station of Nolan Recycling, Stormy Down, The Old Quarry CF33 4RS.

Arriving at approximately 3.30pm, the representatives present on behalf of Nolan Recycling at the inspection were the sites Technically Competent Manager and the sites Environmental Consultant.

The purpose of the visit was to conduct a post-fire inspection, following the waste fire that

occurred on the evening of 18th June 2025, in which first responders from the South Wales Fire and Rescue Service and Natural Resources (Body for) Wales attended.

Initial communications on the evening of the fire between Natural Resources Wales, the Fire and Rescue Service and the Operator were indicating that the fire was contained within the shed building where waste is stored, and that the contaminated firewater run off was being successfully contained by the sites sealed drainage system. Some smoke within the shed was reported as an issue when fighting the fire. A vent was suggested by the Fire and Rescue Service. The Operator advised that at the time of the fire, there was <30 tonnes of waste on site which had been stored between 7-10 days, with stock rotation measures in place and no stockpiling occurring.

Later information from site indicated that some clean water containing FREEFOR SF2 3F wetting agent intended to extinguish the fire, had not entered the sealed drainage system on site, and had escaped through the gap in the side of the waste shed and had subsequently escaped via the soakaway in front of the shed. The gap in the shed building was due to the design of the structure itself and as such, not due to any maintenance issues. During the fire, the Operators consultant provided a copy of the sites drainage plan and after the fire, provided the data sheet for the wetting agent.

I note the location of the soakaway and design of the shed should be considered by the Operator when reviewing the sites FPMP. Considering the suitability of the location of the soakaway and whether the shed itself is intended to form part of the sites infrastructure intended to assist containment.

Following the incident, the sites sealed drainage system was emptied and the firewater was taken to a permitted facility and waste transfer notes were provided and the burnt waste was to be removed as contaminated to a suitably permitted facility.

In terms of any potential water pollution impact on the groundwater which may have occurred as a result of this release, would likely be minimal due to the amount released, and normally be localised around the point of discharge and the pollution unlikely to spread within geological strata.

The sites environmental permit *'does not allow any point source emission into surface waters or groundwater except:*

- clean, rainfall dependant drainage from areas of the site not used in connection with the storage and/or treatment of waste, and*
- integral discharge(s) from the permitted activity (outside areas of the site used in connection with the storage and/or treatment of waste) in accordance with the limits set out in Table S1.1.*

There are to be no emissions to surface and/or groundwater from the buildings on site.

Possible breaches and severity were discussed on site during the post-fire inspection and

are as follows:

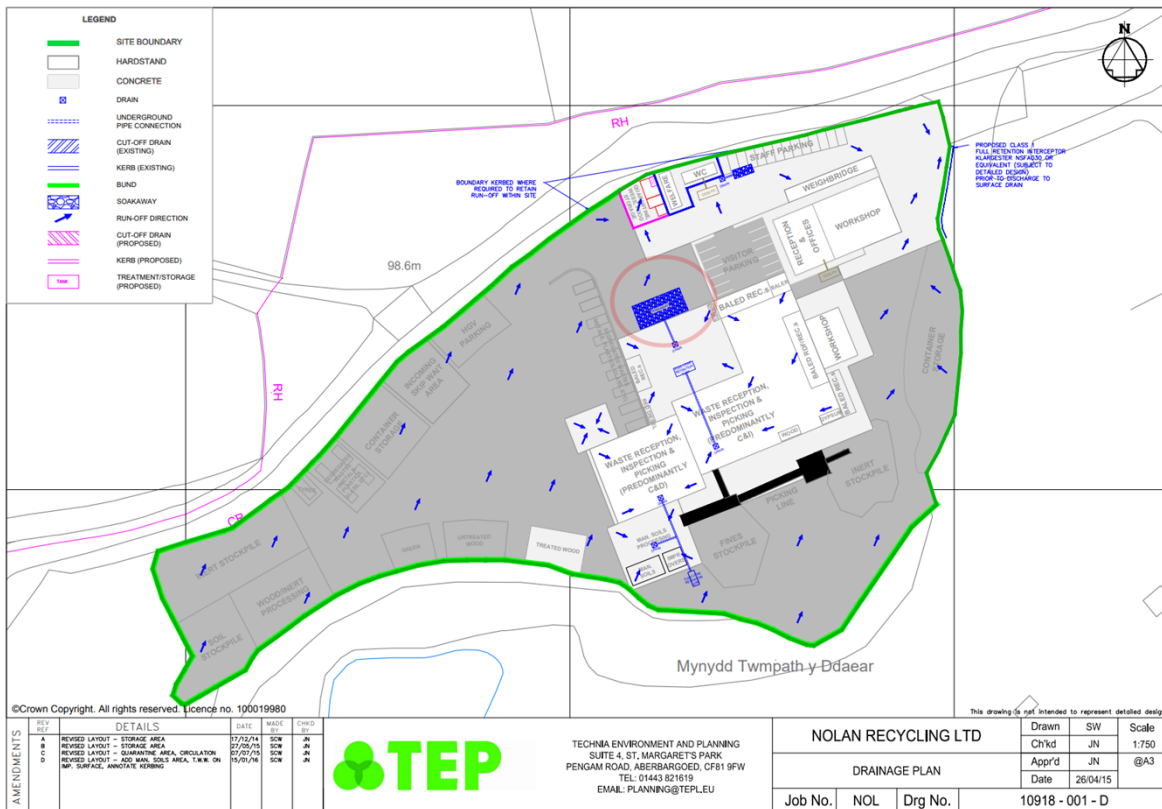
BREACH:

The above containment minor failure has been recorded as a Category 3 breach and recorded against permit condition 2.3.1(a) which states -

2.3.1 (a) states – ‘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. Permit Number: Page 7 Permit issued: EPR/BP3599SZ 27/04/16

(b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.’

The sites current plan v.1.4 acknowledges the that ‘The site and quarry is located on a primary aquifer and there is therefore a risk of contamination of both groundwater and surface water.’ And, Drawing 10918 – 000 - D Drainage Plan (shown below) shows the soakaway located directly in front of the shed. The sites current FPMP does not account for this risk to groundwater due to the location of the sites soakaway, (circled in red below) and design of the shed.



ACTION REQUIRED: Please review the sites FPMP in conjunction with all relevant appendices, including the sites current drainage plan, and drainage survey undertaken following the fire, and provide the revised/amended FPMP to NRW for review. And ensure, any revised FPMP is adhered to onsite. I note the version of the FPMP at the time of the fire was v1.4 310721.

ACTION DUE: Please provide of a date to be agreed with NRW within 10 working days of receipt of this Compliance Assessment Report, for submission of a revised FPMP.

BREACH:

The root cause appears to be a management failure to ensure there are suitable measures in place to protect against the risks posed by the sites activities. Please review the sites risk assessments, procedures and infrastructure to ensure they provide the necessary environmental protection.

A management failure has therefore been recorded as the root cause breach, for the breach of condition 2.3.1. and has been recorded against permit condition 1.1.1.

ACTION REQUIRED: Please review the Environmental Management System for the site, incl. risk assessments, procedures and infrastructure to ensure they provide the necessary environmental protection and provide an updated EMS to NRW if required.

ACTION DUE: Please provide of a date to be agreed with NRW within 10 working days of receipt of this Compliance Assessment Report for submission of a revised EMS.

Advice and guidance:

From preliminary conversations following the fire, it was suggested that the fire may have originated in a pile of waste containing mattresses, believed to be an accumulation of 3 weeks' worth, which was to be confirmed. The findings of the sites investigation report will be able to tell us more in due course.

Please see below exert from the sites FPMP.

Textiles 19 12 08 20 01 10 20 01 11	Source Segregated and sorted wastes from Domestic, and C&D	Carpets, mattresses, occasional clothing	Loads may contain contrary materials.	Low	Low. Properly stored wastes are unlikely to be at risk of self-ignition. For waste of normal composition, stored for appropriate durations, risks are largely limited to external ignition.
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Please consider your segregation and storage times when reviewing the sites FPMP. These will be looked at by NRW as part of reviewing the revised FPMP.

From discussions on site the following day, it was apparent that the Operator was taking a proactive approach to investigating the cause of the incident that had occurred and were in the process of reviewing the sites CCTV. They were asked to provide relevant documentation as requested on site for review by Natural Resources Wales, which included: waste transfer notes, wetting agent data sheet, drainage plan and the sites current Fire Prevention and

Mitigation Plan. The possibility of whether a drainage survey would be required was also discussed. Follow up correspondence from the sites Environmental Consultant on 01/07/27 confirmed that the Operator had requested a full drain survey. I note this would also include the capacities for the water interceptors on site. The findings will need to be considered by the operator when reviewing the sites current FPMP, which at the time of the fire was v1.4 310721.

The Operator informed us that two 40lt drums of wetting agent were used to extinguish the fire, to help reduce the amount of water required and the capacity of the sites sealed drainage system was discussed. The data sheet for the wetting agent used was provided. The FRS advise that the crucial element of using wetting agent effectively is to ensure that the mixing ratio is correct. Please note, having the foam concentrate on site does not allow for the site to reduce their water requirement or containment requirements, this should still be calculated based on stack size. For more information, please use the Fire Prevention and Mitigation Plan guidance available on our website.

We also understand that the fire was discovered around 6pm and reported to the Fire Service by a local bystander, which subsequently led to discussion around the sites Fire Detection measures and site security measures in light of the incident. The operator will need to review the suitability of the sites heat detection and security measures as are part of reviewing the sites Fire Prevention and mitigation measures in line with Natural Resources Wales guidance. Please note this guidance has been revised recently and you would have received an email notifying you of this.

The site subsequently notified Natural Resources Wales of the incident as soon as was practicable amidst dealing the incident, as required by their permit. And during the evening of the fire, the Operator's Environmental Consultant who was on site and available to assist the Fire and Rescue crew and Natural Resources Wales Environment Officer throughout the incident.

ACTION REQUIRED: Please provide a copy of the sites Investigation Reporting detailing the Operators findings.

ACTION DUE: Please provide a copy of the report within 10 working days of receipt of this Compliance Assessment Report. If this is not possible, please advise of a date to be agreed with NRW for submission.

We wish to thank the sites Technically Competent Manager and Environmental Consultant for their time during the post fire inspection. If you have any questions, please get in touch with myself as the Site Regulatory Officer in the first instance.

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.