

Compliance Assessment Report CAR_NRW0049879

Permit being assessed: EP3935UC.

For: Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

At: Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/09/2025.

Parts of permit assessed: 1. Management, 3. Emissions and monitoring, 4. Information.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Swan Alloy UK Ltd, HSE Manager, on 05/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR4B - Installations - Information - Reporting	C3 Minor	4.2.5
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR1A - Installations - Management - General Management	C3 Minor	1.1.4
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
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
IR4B	Action Ref - CAR_NRW0049879.1 - The Operators is to provide Q3 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.	12/01/2026
IR1A	Action Ref - CAR_NRW0049879.2- Provide Certificates of Technical Competence (CoTC) (for the operator) of an appropriate and approved competence scheme as required by condition 1.1.4.	31/08/2026
IR1A	Action Ref - CAR_NRW0049879.3- Provide details of a suitably qualified Technically Competent Manager (TCM) who will undertake the required waste management responsibilities while the operator completes their qualifications. This must include evidence of the TCM's site attendance in accordance with NRW' s How to Comply guidance.	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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This CAR form has been issued in response to the submission of the Q3 2025 monitoring returns (July - September) by the operator (Swan Alloy UK Limited) for activities at Waunarlyydd Works, Swansea, SA5 4SF under permit number EPR-EP3935UC.

This compliance report also includes a review of the site's waste technical competency (Certificates of Technical Competence (CoTC)) and NRW's review and commentary on recent CAR action responses, in particular, the site's Pest Management Plan (PMP).

Q3 2025 Monitoring returns

Q3 2025 monitoring returns submitted as required by Condition 4.2.3. Monitoring returns include emissions to air (emission point A4) and emissions to surface water (emission point WA1) as emissions listed in Schedule 3 of the environmental permit.

Emissions to air (emission point A4) - Reporting form A1 21/02/2023

- The Q3 submissions included the results for all parameters with a quarterly, bi-annual and continuous monitoring frequency required over this period (Particulate Matter, Oxides of Nitrogen, Hydrogen Chloride, Volatile Organic Compounds, Sulphur Dioxide, Hydrogen Fluoride and Dioxins) as specified in Table S3.1.

- The reported emissions were within emission limits specified in the permit for the Q3 monitoring period.

Emissions to water (emission point WA1)

- The Q3 submissions included the results for all parameters specified in Table S3.2.
- The reported emissions were within emission limits specified in the permit for the Q3 monitoring period.
- No samples were able to be obtained in July and September 2025 due to dry weather conditions and inadequate water samples available for laboratory testing. Sample results from August only.

Waste returns

Condition 4.2.5 of the permit requires Swan Alloy to report the waste accepted and removed from the site during the previous quarter; if during that quarter the total amount accepted exceeds 100 tonnes of non-hazardous waste or 10 tonnes of hazardous waste.

Swan Alloy have not provided information in line with condition 4.2.5. **In accordance with NRW's compliance scoring guide, a non-compliance score of C3 has been recorded against sub-criteria IR4B - Reporting - Condition 4.2.5 for this permit contravention.**

Action Ref - CAR_NRW0049879.1 - The Operators is to provide Q3 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.

Waste Technical Competency

As required by condition 1.1.4 of the permit - *The operator shall comply with the requirements of an approved competence scheme*".

The operator is in the process of obtaining relevant Certificates of Technical Competence (CoTC). These certificates demonstrate that individuals responsible for managing waste operations have the required technical knowledge and skills to comply with regulatory standards.

Every operating facility must have a qualified Certificate of Technical Competence (CoTC) in place. This can be:

- An individual TCM with the correct CIWM/WAMITAB qualification, or
- An EU Skills Competency Scheme for the company (similar to ISO 14001).

Only CIWM/WAMITAB and EU Scheme qualifications are approved.

The operator is responsible for identifying which qualifications to demonstrate relevant competency is obtained.

NOTE -The operator must also consider the storage and treatment of hazardous waste (salt cake) when considering you technical competency qualification requirements. Higher level qualifications are likely required.

You can find additional guidance regarding operator competency on the NRW website (Regulatory Guidance Series RGN 5) - [regulatory-guidance-note-5-operator-competence.pdf](#) and withing NRW's *How to Comply with Your Environmental Permit*. [How to comply with your environmental permit](#).

If the site's perspective TCM is not yet qualified, a temporary cover manager (to act as your technically competent person) must be appointed whilst the operator is completing the necessary qualifications. Responsibilities of the TCM include (but not limited to); ensuring operations compliant with permit conditions, monitor environmental risks and prevent pollution incidents, maintain records and advise on best practice.

NOTE - TCM details must be included in quarterly waste returns to be submitted to NRW. TCM must be at site as per attendance requirements in NRW's *How to Comply with Your Environmental Permit*.

Swan Alloy do not comply with the requirements of an approved competence scheme. **This is a contravention of permit condition 1.1.4 of the permit.**

Actions:

Action Ref - CAR_NRW0049879.2- Provide Certificates of Technical Competence (CoTC) (for the operator) of an appropriate and approved competence scheme as required by condition 1.1.4.

Action Ref - CAR_NRW0049879.3- Provide details of a suitably qualified Technically Competent Manager (TCM) who will undertake the required waste management responsibilities while the operator completes their qualifications. This must include evidence of the TCM's site attendance in accordance with NRW' s *How to Comply* guidance.

NOTE - site attendance minimum requirements are detailed in NRW's guidance - *How to Comply with Your Environmental Permit*. [How to comply with your environmental permit](#). A site diary or other methods may be used to record attendance. The Operator must explain in their Environmental Management System (EMS) how site time is monitored and what provisions are in place.

Previous CAR Form actions yet to be completed:

Previous CAR Form actions - CAR_NRW0043896		
Action	Details	Status
2	Operator to re-construct the v-ditch and ensure increased housekeeping regimes in the yard area. On completion of the v-ditch, the operator is required to collect three water samples for testing. Samples to be collected from the front yard, bag house side and yard side. The Operator must submit results to NRW along with photographs showing the re-constructed v-ditch. If water samples exceedances for emission point WA1 continue to exceed, further investigation and implementation measures must be determined.	Ongoing - v-ditch has been re-constructed but water sample at three locations (front yard, bag house side and yard side) results still yet to be submitted

			to NRW - <u>Sampling now</u> <u>planned for</u> <u>November</u> <u>2025.</u>
		Previous CAR Form actions - CAR_NRW0049739 & CAR_NRW0049901	
1	Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests, particularly flies. Submit PMP to NRW.		Complete

Pest Management Plan

Swan Alloy has reviewed and updated the site's Pest Management Plan (PMP). The following actions have been taken:

- **Engagement with Pest Control Contractor:** Swan Alloy consulted their pest control contractor, who also attended the site. The contract now includes coverage for flies (including insects, wasps, and bees).
- **PMP Updates:**
 - Added details of monitoring equipment (e.g., adhesive strips).
 - Included preventative measures such as daily housekeeping, inspection of incoming materials, and timely processing of waste.
 - Outlined staff responsibilities when pest activity is identified or pest control equipment is not functioning (e.g., notifying the pest contractor to arrange a site visit).

Recommendations for further improvement (to be considered as part of the next PMP review, or earlier if required):

- Include additional site-specific information on:
 - Pre-acceptance checks and waste rejection procedures.
 - Maximum storage duration for waste and ensure storage follows a first-in, first-out approach.
 - Define acceptable fly counts, establish trigger levels for intervention, and include checks for breeding signs.
 - Chemical control options.
 - Incident response procedures for handling complaints.
 - Review - review effectiveness of fly control measures and PMP review

frequency.

The PMP should be reviewed regularly and updated in response to site changes, pest trends, or evidence of ineffective control measures.

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.