

Compliance Assessment Report CAR_NRW0050302

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: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 1.1, 3. 3.1.2, 4.2.

NRW Lead Officer: Dale Padfield.

Report sent to: -, CEO & Process manager , on 07/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
3	12

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	Asses the sites preventative maintenance regime with	31/03/2026

Criteria	Action needed	Complete by
	regards to tank clean-out. If not already part of the PPM regime, implement a tank cleaning regime. If already part of the PPM regime, assess frequency and update as necessary. Provide NRW with your findings and actions taken.	
IR3A(1)	Return to compliance.	Already completed
IR3A(1)	Return to compliance.	Already completed

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 (CAR) details the following;

- Q3 2025 Waste returns
- Q3 2025 Monitoring returns
- Schedule 5 notifications

Schedule 5 notifications

On the 24th of September a schedule 5 notification was received detailing an exceedance of the copper ELV (0.5 mg/l) on both the 15th of August 2025 ~ 0.977 mg/l and 18th of August 2025 ~ 0.512 mg/l. Duplicate samples were sent for analysis at an external accredited laboratory which confirmed the exceedance on the 15/08/25, with a result of 0.857 mg/l, a non-compliance will be issued for this exceedance. The external analysis provided a result of 0.129 mg/l for the sample on the 18/08/25, as

such no exceedance will be recorded for the 18/08/25.

On the 5th of the November 2025 5 notification was received detailing an exceedance of the copper ELV (0.5 mg/l) on the 21st of October 2025 ~ 0.789 mg/l.

The notification states that increased concentration was below the trad 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 43 m³, 62 43 m³ and 175 m³ respectively. 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 concentrations do exceed the permitted ELV's. Additionally, any copper 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 copper that were released will ultimately be destined for release into the environment. The two exceedances occurred within different reporting quarters , as such, following NRW's non-compliance scoring rules for ELV exceedances, 2 separate minor non-compliances will be issued.

Non-compliance: Two minor category 3 non-compliances will be issued for exceeding the copper ELV for discharges to sewer. Permit condition 3.1.2.

An internal investigation report was received from the operator primarily detailing the investigation into the lead ELV exceedance occurring on the 21/07/2025. The operator concluded that it was suspected that solids within the filtrate had caused the elevated concentrations.

The waste processed during the exceedance was consistent with previous waste streams. The blend models had identified elevated lead in the filtrate when compared to average discharge levels, but there were predicted to still be well below the BAT ELV.

The elevated lead concentrations had not been detected during the pre-discharge checks due to a lack of sensitivity in the analytical equipment and the calibration range used. Operator error was also involved as the wrong limit is sated to have been used.

Furthermore, tank cleanliness is suspected to influenced the result, with sediment build-up in the treated effluent tank (Tank 4) potentially resulting in increased metal concentrations within the effluent.

Based on the information received, the root-cause therefore has been evaluated as being:

1. Procedural; Tank cleaning should form part of the preventative maintenance regime, if this is already captured in the regime then cleaning frequencies need to be re-evaluated and updated based on recent ELV exceedances.
2. Sufficient resources; The on site analytical equipment is utilised to prevent non-compliant effluent from being discharged from site and is the last measure in place before effluent leaves the site. It is therefore a key control measure in the effluent

process. As such, the analytical equipment should be capable of undertaking the task to the required standard, i.e., have adequate sensitivity, and be calibrated to an adequate range enabling detection of non-conforming parameters within the effluent.

Non-compliance: A category 3 minor non-compliance will be issued against the management system for the above failings. Permit condition 1.1.

The operator has indicated that work will be undertaken to improve the sensitivity of the analytical equipment by changing the analytical and calibration methods. Further corrective actions included the design of a new external analysis sheet, with the aim of improving its 'user friendliness' and updating this sheet more frequently to improve the time in which non compliances are detected and acted upon. Increased monitoring frequencies had also been introduced.

Action 1- Castle Waste Services – 07th January 2026: Asses the sites preventative maintenance regime with regards to tank clean-out. If not already part of the PPM regime, implement a tank cleaning regime. If already part of the PPM regime, assess frequency and update as necessary. Provide NRW with your findings and actions taken. **Due 31/03/2026**

Monitoring returns quarter 3 (July – September) 2025

The reporting form was received within the reporting window. With the exception of the copper exceedance, as detailed above, all parameters were within their respective ELVs. The returns are accepted.

Waste reporting returns quarter 3 (July – September) 2025

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

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.