

Compliance Assessment Report CAR_NRW0050315

Permit being assessed: AB3695CH.

For: Nine Mile Point Waste Transfer Facility, **held by:** Drumcastle Limited

At: Unit 9, Nine Mile Point Industrial Estate, Cwmfelinfach, Ynysddu, Newport, Caerphilly, NP11 7HZ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 16/12/2025 between 10:30 and 13:00.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson, accompanied by Guy Baskerville.

Report sent to: Redacted, General Manager, on 09/01/2026.

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	Action only (X)	
IR4B - Installations - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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	Report future monitoring data for emissions to air and emissions to water as specified in revised Table S4.1 as presented in this report	Already completed
IR4B	Submit future reports of monitoring and assessments carried out using the updated forms specified in revised Table S4.4 as presented in this report	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

Assessment Details

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) site visit to Drumcastle Ltd in Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly (hereafter operator) on 16 December 2025.

The reason for this visit was for the newly appointed Industry Regulation Officer, who is now responsible for regulating this site, to become familiar with on-site operations & activities and to meet the Drumcastle Ltd management team.

A full site tour was provided by the operator covering waste reception & processing, emission abatement practices, process monitoring, fire prevention & mitigation and site security. The visit also provided an opportunity to discuss previously identified conflicts between the environmental permit's monitoring and reporting requirements.

Attendees

Natural Resources Wales

Guy Baskerville [Lead Specialist, Industry Regulation]
David Thomson [Senior Officer, Industry Regulation]

Drumcastle Limited

Redacted [General Manager]
Redacted [Plant Manager]

Monitoring and Reporting

Environmental permit condition 4.2.3 states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Reporting of Monitoring Data – Table S4.1

As outlined in Compliance Assessment Report CAR_NRW0043663, the environmental permit for Drumcastle Ltd contains inconsistencies that prevent compliance by the operator. Table S4.1 requires quarterly reporting of emissions to air, while Table S3.1 sets monitoring frequencies at six-month intervals or based on carbon

media age, creating a conflict with condition 4.2.3. Quarterly reporting for emissions to water is also prescribed in Table S4.1 despite no emission limits set, and only monthly visual checks required. As a consequence of these issues, non-compliance scores for permit condition breaches relating to reporting of monitoring data, have not been levied by NRW.

During discussions on 16 December 2025, NRW informed the operator that a permit variation is required to address these monitoring and reporting inconsistencies (i.e., change the reporting period for emissions to air in Table S4.1 to every 6 months to align with the monitoring frequency). However, in the interim, Table S4.1 has been amended and is presented below. Once this Compliance Assessment Report is issued, any future non-compliances with the reporting requirements prescribed in Table S4.1 or emission limits and monitoring requirements prescribed in Table S3.1 will be subject to non-compliance scores as per the NRW Compliance Classification Scheme (CCS).

Table S4.1 of Schedule 4(a) to the environmental permit. The reporting period for emissions to air has been amended to 6-monthly to mirror the 6-monthly monitoring requirement. The reporting period for emissions to water remains 3-monthly.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1	A1	Every 6 months	1 January
Emissions to water Parameters as required by condition 3.5.1	SW1	Every 3 months	1 January

No changes to Table S3.1 (Point source emissions to air – emission limits and monitoring requirements) have been made. Dust and Total Volatile Organic Compound (TVOC) emissions to air shall be monitored once during each 6-month monitoring period (i.e., January to June and, July to December) and the data presented in the updated air 1 reporting form within 28 days of the end of the reporting period (i.e., by 28 July and 28 January).

Odour concentration shall be monitored in the 7th, 9th and 11th month after each replacement of the activated carbon media and the data presented in the updated air 1 reporting form within 28 days of the end of the 6-monthly reporting period in which the monitoring was undertaken

Monthly water emission monitoring shall continue and the data presented in the updated water 1 reporting form within 28 days of the end of each 3-monthly reporting period (i.e., monitoring undertaken in January, February and March to be reported by 28 April each year etc).

Action: Report future monitoring data for emissions to air and emissions to water as specified in revised Table S4.1 above.

Reporting Forms – Table S4.4

Revised reporting forms for emissions to air and water were not issued to the operator following the most recent permit variation. As a result, the original reporting forms - already containing incorrect operator details - remain in use and do not reflect the current monitoring and reporting requirements. Consequently, non-compliance scores relating to reporting form submission and content, have not been levied by NRW to date.

These reporting forms have now been revised (see Table S4.4 below) to reflect the monitoring and reporting requirements prescribed by the environmental permit, with consideration of the changes detailed above. Copies will be provided alongside this report upon issue.

Table S4.4 of Schedule 4(a) to the environmental permit has been updated.

Table S4.4 Reporting forms		
Parameter	Reporting format	Date of form
<i>Air</i>	<i>Form air 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Water</i>	<i>Form water 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Sewer</i>	<i>Form sewer 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Water Usage</i>	<i>Form water usage 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Energy Usage</i>	<i>Form energy 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Other performance indicators</i>	<i>Form performance 1 or other form as agreed in writing by Natural Resources Wales</i>	<i>09/01/2026</i>
<i>Waste subject to Conditions 4.2.5</i>	<i>Waste tonnage return form from the Environment Agency website or other form as agreed in writing by Natural Resources Wales</i>	<i>N/A</i>

Action: Submit future reports of monitoring and assessments carried out using the updated forms specified in Table S4.4 above.

NRW reminds the operator that any parameter limit exceedance (for emissions to air and water) must be reported immediately in accordance with permit conditions 4.3.1 (b)(i) and 4.3.2. Otherwise, non-compliance scores will be levied for late notification as well as the parameter limit exceedance.

Emissions to Air – Odour Concentration

The operator reported that the activated carbon media used for odour abatement is degrading at a faster rate than anticipated causing its efficacy to be compromised. The operator suggested that the existing odour concentration limit prescribed in Table S3.1 is significantly below a concentration level that may result in an offsite odour pollution, and enquired if it can be increased. NRW advised the operator that changes to permitted emission limit values may only be achieved via a permit variation and an application may not be successful.

[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.