

## Compliance Assessment Report CAR\_NRW0050086

**Permit being assessed:** QP3198FU.

**For:** Rheidol Recycling Park, **held by:** C B Environmental Ltd

**At:** Glan-yr-afon Ind Est, Aberystwyth, Ceredigion, SY23 3JQ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 20/11/2025 between 10:45 and 12:45.

**Parts of permit assessed:** See criteria listed below.

**NRW Lead Officer:** Luke Taylor, accompanied by Malcolm Dines.

**Report sent to:** Leon Gobourn , TCM , on 21/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.4
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	1.1.1
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1

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

Total non-compliances recorded	Total non-compliance score
5	20

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
W1A	Fully review and update the site EMS and provide a copy to	28/02/2026

Criteria	Action needed	Complete by
	NRW for review	
W1A	Obtain the relevant continued competency qualification to cover the activities carried out on site or arrange for the services of a suitably qualified TCM	28/02/2026
W3G	Review and update the Fire Prevention and Mitigation Plan and provide a copy to NRW for review	28/02/2026
W2A	Move waste onto areas covered by impermeable surface with sealed drainage	31/01/2026
W2A	Submit a permit variation to NRW to include heat treatment as a activity.	28/02/2026

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 Compliance Assessment Report is being produced following an announced inspection at Rheidol Recycling Park, undertaken by Luke Taylor (Senior Waste Regulation Officer) and Malcolm Dines (Waste Regulation Officer) of Natural Resources Wales.

The site was operational at the time of the inspection, the weather was dry and bright.

The officers met with site staff, the Technically Competent Manager (TCM), Leon Gobourn, was not present.

The following non compliance were identified.

#### **W1A General Management - Permit Condition 1.1.1 - Category 3**

Your permit states under the above condition that:

The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

During the inspection, a detailed review of the sites Environment Management System (EMS) was undertaken. Officers were supplied with the latest version of the EMS by site

staff, this consisted of several supporting documents and annexes, being marked with various dates back to 2014. During a review of these, a number of issues were identified. The below observations are listed in the order in which the documents were reviewed, including document references where these were listed:

Environmental Management System – EMS/RRP/006 22/09/2025

Page 3 of this document states that the Technically Competent Manager will be on-site 30% of the operational hours. There is nothing within the EMS which specifies the operational hours of the site, or mention of what qualifications the TCM requires to cover the operations being carried out on site.

Page 15, under Section 4.1 – Training Requirements, only refers to Health and Safety training requirements and the HSE. There is nothing mentioned in relation to the TCM requirements or staff training requirements/records.

Section 4.2 - Training & Development Policy refers to a “Training Needs Matrix”. This was not part of the EMS documentation provided and could not be located.

Section 7 – Records, Monitoring and Review. This states that “The EMS is to be audited annually to comply with ISO9001”. There is no evidence of this being the case. It further states that “the EMS is to be reviewed every four years as recommended by NRW”, This is incorrect, as it is the Accident Management Plan that NRW require to be reviewed every four years.

Site Location Map (SLM/RRP/003 PM 14/12/2018)

This document shows the permit boundary excluding the Small Waste Incineration Plant (SWIP) which would be acceptable if only SWIP activities were undertaken within that boundary area, further mention of this below. The permit boundary covers the entire site area, including where the SWIP is operated, and the location plan needs to identify the whole permit boundary area. The Part B permit regulated by the local authority, Ceredigion County Council, is within permitted area of the NRW environment permit.

Environmental Risk Assessment (CBE/ERAR/003 Pete Malvern 20/12/2018)

This document records the processes setting out how the operation will achieve the required end result of activities undertaken, not the control measures necessary to ensure those activities are carried out correctly, efficiently and safely.

Waste Transfer and Treatment Process (CBE/WTTP/002 17/01/2019)

This document is very generic, and doesn't specify what processes apply to each waste or where wastes are stored.

Within this document the drying of waste is listed as a third-party service, presumably this refers to Aber Heat and Power Ltd, the company which operate the SWIP on site. It lists “mixed wastes”, “processed wood”, “plasterboard”, “Mattresses” and “Paper and Card” as being directed to appropriate tipping point and then “transferred to Aber Heat and Power Ltd drying room or container” This would mean that waste transfer notes are required for the movement of this material. There is no evidence that this record of transfer

is being made.

It specifies that at Aber Heat and Power Ltd the wastes undergo a drying process and are then transferred to authorised facilities for further treatment. Again, if waste is being transferred back to Rheidol Recycling Park, then there should be waste transfer notes for this material. The drying of waste which is not destined to be incinerated within the SWIP itself is not permitted under either permit. This is referenced in more detail below.

#### Operational Layout (SP/RRP/OL/003 19/11/2013)

This document is outdated, and there have been several changes to the site layout and storage since the date this was produced.

The EMS presented to officers does not comply with the permit condition, as detailed above.

You must undertake a full review of the EMS, updating and it to reflect the operations on site, removing outdated or incorrect information and ensuring that staff on site have access to a copy of it and are aware of its contents.

**ACTION - Fully review and update the site EMS and provide a copy to NRW for review. Deadline 28/02/2026**

#### **W1A General Management - Permit Condition 1.1.4 - Category 3**

Your permit states under the above condition that the operator shall comply with the requirements of an approved competence scheme.

When reviewing the TCM provision for the site, officers have identified that the current TCM Leon Gobourn, does not have the required level of qualification to manage the activities being carried out on site. The qualification currently held only covers the treatment of end of life vehicles. Leon has previously held a continued competency certificate covering the hazardous transfer and treatment of waste, however this expired on 18/02/2024.

The end of life vehicle qualification expires on 14/02/2026.

**ACTION - Obtain the relevant continued competency qualification to cover the activities carried out on site or arrange for the services of a suitably qualified TCM. Deadline 28/02/2026**

#### **W3G Fire - Permit Condition 1.1.1 - Category 3**

Whilst the permit does not yet contain a requirement for a stand alone Fire Prevention and Mitigation Plan (FPMP) you have produced one and the site is operating with this. During the inspection, document reference 'Fire Prevention and Mitigation Plan (FPMP/RRP/001 Pete Malvern 29/01/2022)' was provided to officers as the site FPMP, this is also the latest copy held on file, having been supplied following previous compliance work.

This document appears to be based on the FPMP for the adjacent household waste recycling centre, and states that waste storage at the site is less than 20 tonnes. This is not the case.

Although it is not currently a requirement, the site has been operating under this FPMP for some time, rather than it being included within the site EMS itself. As a result, this must be an accurate document, which accounts for the risks on site and fully details how these will be managed, along with procedures to be carried out in the event of a fire on site. Staff must also be aware of this document and understand their role in the event of a fire occurring.

**ACTION - Review and update the Fire Prevention and Mitigation Plan and provide a copy to NRW for review. Deadline 28/02/2026**

### **W2A Permitted Activities - Permit Condition 2.1.1 - Category 3**

Your permit states under the above condition that The operator is only authorised to carry out the activities specified in schedule 1 table S1.1

Table S1.1 states, under 'Activity Reference A5 – Household, commercial and industrial waste transfer station activity' that Waste shall be stored and treated on an impermeable surface with a sealed drainage system. During the inspection there were several areas where this was not the case. The below have been consolidated under the same category 3 breach.



(Image of waste UPVC window frames stored on hardstanding with skip full)



(Images of paint being stored on hardstanding, without secondary containment)

In addition to this, under 'Activity Reference A1 - Vehicle depollution and dismantling activity' states that only uncontaminated plastic, glass and ferrous and non ferrous metal wastes arising from the treatment of end of life vehicles shall be stored on hard standing. During the inspection an end of life vehicle, which had not been fully depolluted in line with the end of life vehicle regulations, was being stored on hardstanding, having been filled with other waste. This vehicle needs to be moved onto impermeable surface until it has been fully depolluted.



(Image of an ELV not fully de-polluted being stored on hardstanding)

**ACTION - Move the relevant wastes to areas of impermeable surface with sealed drainage as required. Deadline 31/01/2026**

### **W2A Permitted Activities - Permit Condition 2.1.1 - Category 3**

Your permit states under the above condition:

The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

Table S1.1 states under activity reference 'A5 – Household, commercial and industrial waste transfer station activity' that the limits of activity are:

Treatment consisting only of: -

- sorting
- separation
- bulking up
- screening
- baling
- shredding
- crushing
- compaction,

of non-hazardous waste into different components for recovery or disposal.

You have been scored for the above breach as polystyrene waste is being subject to heat treatment in order to reduce its volume for onward transport. Whilst this activity has benefits in terms of transportation costs and reduced environmental impact from haulage, heat treatment is not an

activity listed on the permit.

This has been brought to your attention previously on Compliance Assessment Report reference CAR\_NRW0033497 issued in 2018, and has been discussed with the previous site TCM on several occasions. The permit must be varied to add heat treatment as an activity.

Heat generated by the Small Waste Incineration Plant (SWIP) being used to dry waste. The SWIP permit was issued and is regulated by the local authority, Ceredigion County Council, under Schedule 13 of the Environmental Permitting Regulations, incorporating the relevant provisions of the Industrial Emissions Directive.

Heat generated by the SWIP is being directed into a drying room to dry waste mattresses and plasterboard. It is acknowledged that this activity reduces weight from moisture retention, and impacts onward transport costs, however this activity requires the environmental permit regulated by NRW to be varied to include heat treatment as a permitted activity. The only wastes which are permitted to be dried with the heat generated by the SWIP currently are wastes which are to be incinerated within the SWIP itself.

The two breaches above has been consolidated into a single breach under the same category.

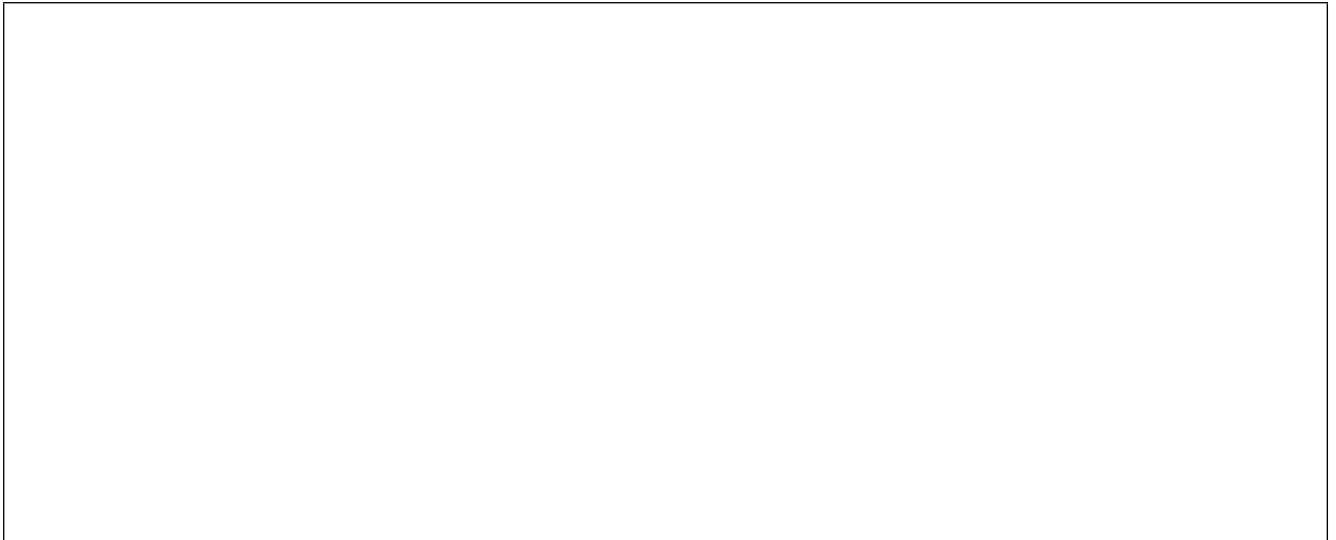
**ACTION - Submit a permit variation to NRW to include heat treatment as a activity. Deadline 28/02/2026**

If you wish to discuss any aspect of this Compliance Assessment Report, please contact me:

[luke.taylor@cyfoethnaturiolcymru.gov.uk](mailto:luke.taylor@cyfoethnaturiolcymru.gov.uk)

Regards,  
Luke Taylor

*In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.*



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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to 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.

**Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

**Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [ask@ombudsman.wales](mailto: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.