

Compliance Assessment Report CAR_NRW0050529

Permit being assessed: BX9846ID.

For: Waunarlwydd EPR/BX9846ID, **held by:** Timet UK Ltd

At: Timet UK Ltd Timet Waunarlwydd , Waunarlwydd, SWANSEA, West Glamorgan, SA5 4SF.

Type of assessment: Other,

Reason: Routine.

On: 30/01/2026.

Parts of permit assessed: Proposed improvement works to A Bay acid offloading area.

NRW Lead Officer: Daniel Packer.

Report sent to: Rob Crellin, HSE Leader, on 30/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Assessed (A)	

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?

No action required.

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

1. Purpose of Assessment

This Compliance Assessment Report documents NRW's assessment of TIMET's proposed works relating to improvements to the A Bay acid offloading area, including installation of a new ACO perimeter drainage system, procedural controls, and associated risk mitigation measures.

The assessment is based on written email submissions from the operator between 26 November 2025 and 28 January 2026 and subsequent clarifications provided by email.

2. Scope of Operator's Proposal

TIMET has proposed a number of improvements to manage the risks associated with acid deliveries, localised spills, and potential loss of containment. The proposal includes:

2.1 Installation of Perimeter ACO Drainage

- A new gravity-fed ACO drainage system will be installed around the A Bay acid offloading area.
- The system will act as a transfer system in accordance with CIRIA C736, conveying acid to the existing underground acid drainage line and onward to the site's Effluent Treatment Plant (ETP).
- The ACO system is designed to be:
 - Liquid tight
 - Chemically resistant
 - Constructed of suitable materials
- Hydraulic calculations confirm:
 - Total drain capacity: 1.95 m³ (195% of required maximum containment).
 - Under storm event of 50 mm/hr, system operates at 36% capacity, with 125% residual capacity even before considering ongoing discharge to the ETP.

2.2 Surface Water Drainage and Control Valve

- The ACO system will be connected to both stormwater and acid drainage networks.
- A manually operated pollution control valve will be used to direct flow during deliveries isolating the stormwater system, ensuring flow into the acid drainage network only.

2.3 Management of Debris and Leaf Fall

- Operator acknowledges risk of leaf fall due to nearby woodland.
- TIMET proposes:

- Monthly cleaning schedule for ACO channels.
- Pre-delivery inspection prior to every acid offload, ensuring drains remain free from debris.
- Staff will be trained and supervised. TIMET has confirmed procedures will be updated accordingly.

2.4 Alternative Measures

- A raised pavement/speed bump inside the access gate as a supplementary control to be installed, though not the primary mitigation.

2.5 Monitoring Recommendations

- TIMET intends to incorporate an MCERTS-compliant sensor in a downstream chamber to monitor discharges.

3. Assessment Against Permit Requirements & CIRIA C736

NRW has assessed the information provided against relevant standards, including CIRIA C736: *Containment systems for the prevention of pollution*.

3.1 Secondary Containment & Transfer System

- The proposed ACO drainage system functions as a compliant transfer system under CIRIA C736.
- The ETP provides remote secondary containment, acceptable where transfer capacity is robust.

3.2 Drainage Integrity

- Recent re-lining works and ongoing maintenance commitments satisfactorily demonstrate ongoing management of underground infrastructure.

4. Conclusion of Regulatory Assessment

Based on the information provided, NRW considers the proposed works and procedural controls acceptable and compliant with the requirements of the Environmental Permit and relevant guidance, subject to implementation as described.

Note – should the capacity requirements of the system change, due to increased volume of liquid, the proposed system will need to be reviewed for suitability of use.

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 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 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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

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

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

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.