

Compliance Assessment Report CAR_NRW0050552

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: 31/12/2025.

Parts of permit assessed: 3. Emissions and Monitoring, 4. Information.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Swan Alloy UK Ltd, HSE Manager, on 11/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
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
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4B - Installations - Information - Reporting	C3 Minor	4.2.5
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR3A(1)	Action Ref - CAR_NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and	23/02/2026

Criteria	Action needed	Complete by
	further actions agreed to prevent recurrence of the oil and grease exceedance incident.	
IR3A(1)	Action Ref - CAR_NRW0050552.2- Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the aluminium exceedance incident. Additionally, Swan Alloy are to provide results for the second sample taken and confirm return to compliance with the permit limit for aluminium.	23/02/2026
IR4B	Action Ref - CAR_NRW0050552.3 -The Operators is to provide Q4 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.	23/02/2026
IR1A	As per previous CAR - 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.	11/02/2026

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 report has been issued in response to the submission of the Q4 2025 monitoring returns (October - December) by the operator (Swan Alloy UK Limited) and the annual submissions report for activities at Waunarwydd Works, Swansea, SA5 4SF under permit number EPR-EP3935UC.

Q4 2025 Monitoring Returns

Q4 2025 monitoring returns have been 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 Q4 submissions included the results for the following parameters; Particulate Matter, Hydrogen Chloride, Volatile Organic Compounds and Sulphur Dioxide as specified in Table S3.1 (continuous and quarterly monitoring frequencies).
- The reported emissions were within emission limits specified in the permit for the Q4 monitoring period.

Emissions to water (emission point WA1)

- The Q4 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 Q4 monitoring period with the exception of the following:
 - Oil and grease -October 2025.
 - Aluminium - December 2025.
 - Schedule 5 Notifications were submitted for these permit limit exceedances.

Schedule 5 Notification - October 2025

On the 7th November 2025, the operator submitted a Schedule 5 Notification detailing an exceedance of an emission limit at WA1.

A sample result of 13.8mg/l of oil and grease was recorded (sample taken 19th October 2025). As per Table S3.2, emission point WA1 for oil and grease shall not exceed 10mg/l and therefore not in compliance.

Part B of the Schedule 5 Notification detailed further measures to prevent pollution including:

- Escalation to management team. Corrective and preventative actions to be discussed.
- The operator contacted the laboratory regarding sample result - the laboratory did not find any issues with the original results. A second sample was also taken. Oil and grease concentrations from the November sample were back within permit limits.
- Daily housekeeping regimes are in place with 3rd party jet sweeper.
- Further actions to be agreed.

Compliance breach - Swan Alloy has failed to comply with the oil and grease emission limit of 10mg/l as specified in Schedule 3, Table S3.2. This is a contravention of condition 3.1.2 of the permit. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR3A(1) - Emissions to Water.

Action Ref - CAR_NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the oil and grease exceedance incident.

Schedule 5 Notification - December 2025

On the 7th January 2026, the operator submitted a Schedule 5 Notification detailing an exceedance of an emission limit at WA1.

A sample result of 2.96mg/l of Aluminium was recorded (sample taken 5th December 2025). As per Table S3.2. emission point WA1 for aluminium shall not exceed 1.5mg/l and therefore not in compliance.

Part B of the Schedule 5 Notification detailed further measures to prevent pollution including:

- Escalation to management team. Corrective and preventative actions to be

discussed.

- Second sample taken.
- Daily housekeeping regimes are in place with 3rd party jet sweeper.

Compliance breach - Swan Alloy has failed to comply with the aluminium emission limit of 1.5mg/l as specified in Schedule 3, Table S3.2. This is a contravention of condition 3.1.2 of the permit. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR3A(1) - Emissions to Water.

Action Ref - CAR_NRW0050552.2- Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the aluminium exceedance incident. Additionally, Swan Alloy are to provide results for the second sample taken and confirm return to compliance with the permit limit for aluminium.

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_NRW0050552.3 -The Operators is to provide Q4 2025 waste returns as required by Condition 4.2.5 of the environmental period EPR/EP39395UC.

Annual Submissions 2025

The operator is required to submit annual submission on the performance of the activities over the previous year by 31 January. The operator submitted their annual report on the 30th January 2025; within the specified reporting window as per condition 4.2.2.

Annual PM Submission - Reporting form A1 21/02/2023

Annual total of PM is in compliance with the annual limit set in Table S3.3.

Annual Production - Reporting form Performance 1 /21/02/2023

The annual submission contained all the required information in accordance with permit condition 4.2.2(b).

Water Usage - Reporting form Waterusage 1 /21/02/2023

The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Energy Usage -Reporting form Energy 1 /21/02/2023 The annual submission contained all the required information in accordance with permit condition 4.2.2(c).

Other performance indicators - Reporting form Performance 1 /21/02/2023

The annual submission contained all the required information in accordance with permit condition 4.2.2(c)

Previous CAR Form actions

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.	Complete
Previous CAR Form actions - CAR_NRW0049879		
1	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.	Overdue
2	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.	Due 31/08/2026 - in progress
3	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.	Complete

Waste Technical Competency

NRW provided commentary on waste technical competency in a recent compliance report (CAR_NRW0049879). Actions were set for the operator to complete (see table above). It is acknowledged that the operator is in the process of obtaining relevant Certificates of Technical Competence (CoTC) and completion of Action Ref - CAR_NRW0049879.2 will be complete in due course. As mentioned in the previous compliance report, **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.** The operator has confirmed they are registered and competing CIWM Level 4 Waste and Resource Management which falls under the medium risk facilities rating. Given the site stores hazardous waste generated from their onsite processes (salt slag) and this waste stream is treated by mechanical means (mechanically reducing the size of the salt slag). This therefore likely pushes the site into the higher risk facilities and therefore a higher level of competency and more units (12 units) required. It is understood that units currently being completed can be transferred over to this higher level of qualification. This should be discussed and agreed with your training provider.

Action Ref - CAR_NRW0049879.3 required the appointment of a suitably qualified Technically Competent Manager (TCM) who will undertake the required waste management responsibilities while the operator completes their qualifications. Swan Alloy

have appointed a interim TCM and provided evidence of their qualifications.

Site attendance minimum requirements are detailed in NRW's guidance - *How to Comply with Your Environmental Permit*. [How to comply with your environmental permit](#). **You must discuss site attendance with your appointed TCM and meet the site attendance requirements as per NRW's guidance.** 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.

NRW considers Action Ref - CAR_NRW0049879.3 complete.

NRW have not received the Q3 2025 waste returns as required by condition 4.2.5 of the permit and as per the previously requested compliance report action (Action Ref - CAR_NRW0049879.1). **Due to the failure to provide the required response regarding a set action, NRW considers there to be a contravention of permit condition 1.1.1. Consequently, a further non-compliance score of C3 has been allocated against compliance criteria IR1A – General Management.**

The root cause into the failure of this permit contravention has not been assessed at this time and will be subject to future investigations.

Note: This CAR report and assessment was undertaken on the 11.02.2026. However, to ensure that any non-compliance scores are attributed to the correct financial year (for billing) the date on the CARS system has been altered to 31st December 2025.

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.