

Compliance Assessment Report CAR_NRW0050773

Permit being assessed: GP3692LQ.

For: RMR Recycling Ltd, **held by:** RMR Sand and Aggregates Limited

At: Pen-y-Fan Pond Lane, Manmoel Road, Manmoel, Blackwood, Caerphilly, NP12 0HY.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Yard Manager, on 20/02/2026.

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	C4 No impact	4.2.4 (January to June 2025)
IR4B - Installations - Information - Reporting	C4 No impact	4.2.4 (July to December 2025)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
2	0.2

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	The operator shall submit future monitoring reports for emissions to water inside the 28-day reporting window	Already completed
IR4B	The operator shall submit future monitoring reports for	Already

Criteria	Action needed	Complete by
	emissions to water inside the 28-day reporting window	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

Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment of RMR Recycling Limited's (hereafter the operator) **6-monthly** [January to June 2025 & July to December 2025] and **annual** [January to December 2025] monitoring and reporting submissions against the relevant environmental permit conditions for Reporting, Emissions & Monitoring and Notifications.

Reporting (IR4B)

(1) Condition 4.2.3 of the environmental permit states:

For the following activities referenced in schedule 1, table S1.1 (A1) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency [sic] by 31 January (or other date agreed in writing by the Environment Agency [sic]) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data.

Table S1.1 of Schedule 1 to the environmental permit is partially reproduced below.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity and waste types
A1	S6.3 B (a) (i) heating, but not distilling, tar or bitumen in connection with any manufacturing activity.	The heating of bitumous materials (asphalt) for the purpose of reprocessing it for reuse. (R5): Recycling/reclamation of other inorganic compounds	The heating of non contaminated bitumous wastes to produce ready to use asphalt.

Note: The A1 activity referenced in table S1.1 of Schedule 1 of the environmental permit has not been, is not and is unlikely to be undertaken at the installation. Monitoring and reporting requirements in respect to this activity is withdrawn. Should the activity commence, monitoring and reporting requirements are reinstated.

(2) Condition 4.2.4 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency [sic], 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 S4.2; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 to the environmental permit is reproduced over leaf.

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 3.3.1	A1	Every 12 months	1 January
Emissions to air Parameters as required by condition 3.3.1	A1	On pressure valve release	On pressure valve release
Emissions to water Parameters as required by condition 3.3.1	W1	Every 6 months	1 January 1 July

Table S4.2 of Schedule 4 to the environmental permit is reproduced below.

Table S4.2 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency [sic]	
Water and Land	Form water 1 or other form as agreed in writing by the Environment Agency [sic]	

Compliance Assessment

Point source emissions to air – A1

As stated above, the A1 activity referenced in table S1.1 of Schedule 1 of the environmental permit, which is responsible for producing air emissions, has not been, is not and is unlikely to be undertaken at the installation. Monitoring and reporting requirements in respect to this activity is withdrawn. Should the activity commence, monitoring and reporting requirements are reinstated.

Point source emissions to water (other than sewer) – W1

1. The reporting form for emissions to water were submitted by the operator via email on 05 August 2025 and 11 February 2026 (document reference: *Water Reporting 1 2025 and Water Reporting 2 2025*).
2. The reporting form submissions were not made inside the 28 day reporting window which represents two occurrences of non-compliance with permit condition 4.2.4.

Compliance Classification Scheme (CCS): As a result of two non-compliances with permit condition 4.2.4, two CCS scores [C4] have been recorded against compliance sub-criteria IR4B – Information – Reporting.

Justification: A C4 score has been levied as it is reasonably foreseeable that the late submission of reporting form water 1 will not have any impact on the environment.

Action: The operator shall submit future monitoring reports for emissions to water inside the 28-day reporting window

3. The reporting forms submitted are for the reporting period specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.
4. Emissions to water data was submitted using the form specified in Schedule 4 Table 4.2 (i.e., water 1) which represents compliance with the environmental permit.
5. The reporting form submitted included results for all parameters and emission points specified in Schedule 4 Table S4.1 which represents compliance with the environmental permit.

Emissions and Monitoring (IR3A)

Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Table S3.2 of Schedule 3 to the environmental permit is reproduced below.

Table S3.2 Point source emissions to water (other than sewer) – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
W1 onsite plan schedule 7 emissions to Sirnowy tertiary tributary watercourse	Total suspended solids	Surface water from bypass interceptor	50ml/L	Instantaneous	6 Months	In accordance with M18 guidance
	Oils and grease	Bypass interceptor	No visible oil or grease	Instantaneous	Weekly	Visual examination of discharge

Table S3.3 of Schedule 3 to the environmental permit is reproduced below.

Table S3.3 Surface water or groundwater monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
W1 onsite plan schedule 7 emissions to Sirnowy tertiary tributary watercourse	Copper Iron Leas Zinc	6 monthly	In accordance with M18 guidance	
	Ammoniacal Nitrogen	6 monthly	In accordance with M18 guidance	

Compliance Assessment

Point Source Emissions to Water – W1

Emissions monitoring data submitted by the operator on 05 August 2025 and 11 February 2026 demonstrate that all measured parameter results were within the permitted emission limits which represents compliance with

the environmental permit.

Compliance Classification Scheme (CCS): *There are no occurrences of non-compliance with permit condition 3.1.2*

Action: *No action required*

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Notification (IR4C)

The purpose of this section is to record environmental permit condition breaches arising from the late notification of any condition breach to NRW. Condition 4.3.1(b) of the environmental permit states:

The Environmental Agency shall be notified without delay following the detection of:

(b) the breach of a limit specified in the permit

Furthermore, condition 4.3.2 of the environmental permit states:

Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

Compliance Assessment

Point Source Emissions to Water – W1

Not applicable – the operator has not exceeded an emission limit specified in the permit.

[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.