

Compliance Assessment Report CAR_NRW0050884

Permit being assessed: KP3636HB.

For: The Recycling Centre EPR/KP3636HB, **held by:** Egan Waste Services Limited

At: Egan Waste Services Recycling Centre Unit A15 Treforest Industrial Estate ,
Pontypridd, CF37 5TA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 1.1, 2.3.2, 4.2.2, 4.2.3, 2.6.1, 2.1.1, .

NRW Lead Officer: Dale Padfield.

Report sent to: ~, Dangerous Goods Safety Advisor , on 09/03/2026.

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)	
IR2A - Installations - Operations - Permitted activities	C3 Minor	2.3.2
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(b)
IR4B - Installations - Information - Reporting	C3 Minor	4.2.3(c)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(b)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR2E - Installations - Operations - Improvement programme	C2 Significant	2.6.1
IR2A - Installations - Operations - Permitted activities	C2 Significant	2.1.1
IR1A - Installations - Management - General Management	Action only (X)	
IR2C - Installations - Operations - Operating	Action only (X)	

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
techniques		

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

Total non-compliances recorded	Total non-compliance score
6	78

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	Action 1: Egan Waste 27th February 2026: Provide the waste transfer notes for the waste with EWC code 02 06 03 detailing the waste received and removed.	13/03/2026
IR2A	Action 2: Egan Waste 27th February 2026: Provide the waste transfer / consignment notes detailing the wastes (EWC - 08 01 12, 08 04 10, 16 05 09, 11 01 11) received and removed.	13/03/2026
IR1A	Action 3: Egan Waste 27th February 2026: Review waste acceptance procedures and identify what weaknesses resulted in the acceptance of non-permitted wastes. Provide NRW with the conclusion of the review and details of any corrective actions.	31/03/2026
IR4B	Action 4 – Egan Waste – 27th February 2026: Egan Waste to review and amend the reporting forms, ensuring all the required information is reported correctly. Re-submit forms upon completion	13/03/2026
IR1A	Action 5 – Egan Waste – 27th February 2026: Egan Waste to review procedures related to the permit reporting requirements to ensure they contain adequate detail on how to complete the necessary forms with the correct information. Provide NRW with a copy of the procedure(s) once complete.	30/04/2026
IR3A(1)	Action 6 – Egan Waste – 27th February 2026: Egan Waste to review and update their sampling procedure to incorporate the requirements of the guidance. Provide NRW with a copy of the procedure once complete. Additionally, Egan waste should determine a plan to evaluate the homogeneity of the waste water discharges, provide a copy of this plan to NRW.	30/04/2026
IR3A(1)	Action 7 – Egan Waste – 27th February 2026: Egan Waste to commence sampling of each batch discharge in line with permit requirements immediately. Where improvements are identified as the procedure is updated, these should be implemented on a rolling basis, however, all batch discharges should now be sampled in line with the permit frequency. Provide NRW with confirmation that sampling will commence.	02/03/2026

Criteria	Action needed	Complete by
IR2E	Action 8 Egan Waste – 27th February 2026: Complete improvement condition 8 and provide an engineering report demonstrating conformance to CIRIA 736 or an equivalent engineering standard.	31/03/2026
IR2A	Action 9 Egan Waste – 27th February 2026: Egan Waste to terminate any further waste storage and treatment operations taking place outside of a building immediately and remove any waste currently stored in this manner. Provide NRW with confirmation once complete.	31/03/2026
IR1A	Action 10 Egan Waste – 27th February 2026: Egan Waste to investigate and provide an explanation as to why waste storage and treatment is taking place outside of a building and determine what steps are required to return to compliance. Provide NRW with a response of your findings and intended steps to return to compliance.	31/03/2026
IR2C	Action 11 Egan Waste – 27th February 2026: Egan Waste to provide a copy of the sites planned preventive maintenance schedule.	31/03/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Egan Waste Services Limited

EPR/KP3636HB

This compliance assessment report (CAR) details the following:

- Assessment of quarter two (April – June) waste returns 2025.
- Assessment of quarter three (July – September) waste returns 2025.
- Assessment of quarter four (October – December) waste returns 2025.
- Assessment of emissions to sewer
- Annual reporting returns 2025
- Actions from CAR NRW0048202

- Actions from CAR_NRW0045221
- Improvement condition 8 (IC8)

Quarter two (April – June) waste returns 2025

Return received within reporting window. All received and removed EWC codes permitted within the permit. Returns accepted.

Quarter three (July - September) waste returns 2025

All received EWC codes compliant with permit.

The following EWC code was reported as removed from site but did appear as received:

02 06 03 ~ 1.64 tonnes

Action 1: Egan Waste 27th February 2026: Provide the waste transfer notes for the waste with EWC code 02 06 03 detailing the waste received and removed. **Due 13/03/2026**

Quarter four (October – December) waste returns 2025

All received EWC codes compliant with permit.

The following EWC codes were reported as removed from site but did appear as received and are not authorised under the permit:

08 01 12 ~ Total of 5 tonnes.

08 04 10 ~ Total of 1 tonne.

16 05 09 ~ 1.23 tonnes.

11 01 11 ~ 0.275 tonnes.

The quantities of EWC 08 01 12, 08 04 10, 02 06 03 and 16 05 09 suggest unauthorised wastes have been accepted onto site whereby the wastes are not listed within schedule 2 tables S2.1, S2.2 or S2.3 of the permit AND/OR the waste did not conform to the description in the documentation supplied by the producer and holder. As such, the following non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the operator accepting non-permitted waste onto the site. Permit condition 2.3.2.

Action 2: Egan Waste 27th February 2026: Provide the waste transfer / consignment notes detailing the wastes (EWC - 08 01 12, 08 04 10, 16 05 09, 11 01 11) received and removed. **Due 31/03/2026**

The root cause of the non-permitted waste acceptance is a management system failure. It often arises from weaknesses in pre-acceptance checks, inadequate staff training, ineffective verification processes, poor oversight, and the absence of robust compliance controls at the waste pre-acceptance and acceptances stages. Collectively, these failures prevented the operator from identifying and rejecting wastes not authorised by the conditions of the permit (Condition 2.3.2).

Non-compliance: A category 3 minor non-compliance is issued for the operators management system failing to prevent unauthorised wastes being accepted onto site. Permit condition 1.1.1.

Action 3: Egan Waste 27thth February 2026: Review waste acceptance procedures and identify what weaknesses resulted in the acceptance of non-permitted wastes. Provide NRW with the conclusion of the review and details of any corrective actions. **Due 31/03/2026**

Emissions to Sewer

Emissions of parameters samples by DCWW are within respective ELVs. Some parameters have not been sampled as this related to an on-going action for Egan to formalise the sampling procedures prior to commencement. Further details are provided below in the CAR form.

Annual performance reporting 2025

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Water Usage

A total of 280 m³ was reported to be used on site. The specific usage has not been reported correctly. The reporting form requires specific usage to be reported as m³ per unit output.

Energy Usage

A total of 43.71 MWh of electricity and 2 tonnes of recovered fuel oil was reported. Figures for primary usage and specific usage have not been reported correctly.

Performance reporting form

Egan reported a total of 336 tonnes of oil recovered and 976.9 m³ of waste water generated. For the total amount of waste treated, residues generated and raw materials used, a total of zero tonnes was reported.

The reporting forms W1 and E1 have not been completed as required and are **not accepted**.

Permit condition 4.2.3(c) requires the operator to 'give the information from such assessments as may be required by the forms specified in those tables schedule 4 table S4.1 and S4.4'. In CAR_NRW0045221 advice and guidance was given, explaining what was required on the reporting forms and an expectation that this would be a requirement for the annual reports going forward.

The information is requested to be submitted in this format to allow for meaningful comparisons of the sites energy and water usage year on year. This information can then be used to track any trends and links to permit conditions 1.2 and 1.3. The operator does **not** have arduous annual reporting requirements, has been provided with direction on what is required and time to implement changes to meet the reporting requirements. However, the operator has failed to provide the required information. As such, the following minor non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued for the operator failing to provide the information requested on the annual reporting forms – ‘WaterUsage1, Energy 1 and Performance1’. Permit condition 4.2.3(c)

Action 4 – Egan Waste – 27th February 2026: Egan Waste to review and amend the reporting forms, ensuring all the required information is reported correctly. Re-submit forms upon completion. **Due 13/03/2026**

When a non-compliance is issued, NRW will also seek to identify the root-cause, which will be scored on its own merits, with the aim of preventing a re-occurrence of the non-compliance. In this instance, the root cause is seen as a failure to comply with permit condition 1.1, whereby the operator either has a lack of familiarity or understanding of the permit conditions and reporting requirements or deficiencies in the management system (i.e., procedures dictating the reporting requirements are insufficient. Reporting procedures should have been updated following the advice and guidance issued in CAR_NRW0045221, indicating a lack of review and implementation of corrective actions. The following non-compliance will be issued.

Non-compliance: A category 3 minor non-compliance is issued against the management system failing to ensure the permit reporting requirements are met. Permit condition 1.1.1 (b).

Action 5 – Egan Waste – 27th February 2026: Egan Waste to review procedures related to the permit reporting requirements to ensure they contain adequate detail on how to complete the necessary forms with the correct information. Provide NRW with a copy of the procedure(s) once complete. **Due 30/04/2026**

Actions from CAR NRW0048202

The action is copied below for ease of reference.

‘Action 1 – Egan Waste – 2nd May 2025: Egan Waste to develop & implement written procedures for the inspection and maintenance of the filtration system. Please send a copy of the procedure once complete.’

The written procedure was provided ‘SHEQ-STD-PRO-026-Water Sampling Procedure’. The procedure has been reviewed and the following observations have been made:

Requirement (EA Guidance)	Current Procedure	Gap Identified
EA requires sampling to be representative, with a defined monitoring approach and justification.	Grab sample taken only when flow is present; no justification or monitoring strategy defined.	No rationale for grab sampling or evidence of representativeness.
MCERTS required for personnel competence, instruments, and laboratory accreditation.	No mention of MCERTS personnel, labs, or equipment.	Missing mandatory MCERTS alignment.
Guidance requires quality assurance/quality control (QA/QC), including method performance, uncertainty, calibration, and auditability.	Basic hygiene measures only; no QA/QC checks, calibration, blanks, or uncertainty assessment.	Procedure lacks full QA/QC framework.
Sampling procedures must reference recognised standards and include	Container types and cooling included; no reference to ISO	Missing standard references

preservation, transport, and specific container requirements.	5667 or preservation standards beyond cooling.	and full preservation details.
Analytical methods must meet performance criteria and use accredited labs.	Only states to deliver samples to a lab.	No reference to method performance, detection limits, or accreditation.
Guidance requires management system alignment with ISO/IEC 17025, including audit trails, data review, and internal audits.	Log sheet exists, but no audit trail, review process, or management system.	Missing formal management system documentation and auditing.
Guidance requires flow considerations and use of composite sampling where appropriate.	Only checks if water is “running”; no flow measurement or composite sampling criteria.	Flow characterisation absent; sampling method may not reflect discharge variability.
Guidance requires competent and trained personnel for sampling activities under MCERTS.	No competence or training record requirement included.	Training/competence not addressed.
Non-conformances must be recorded and corrective action processes must exist.	Deviations can be noted, but no corrective action or formal non-conformance process.	Missing structured non-conformance and corrective action system.

The procedure is lacking detail and clarity on the aspects included and is missing large sections of what would be expected. The procedure should also include details on frequency of sampling for each parameter and specific handling and preservation techniques for each parameter. The procedure details that only if water is running then a sample can be obtained, however, the procedure needs to clearly identify that samples must be obtained for every discharge. The permitted monitoring frequency is daily for several of the parameters, this means that samples need to be obtained for each ‘batch’ of discharged process water from the oil recovery process. As stated in the CAR formed mentioned above, Egan also need to establish if the waste water is homogenous or heterogeneous to determine an appropriate sampling approach, i.e., if a spot or composite sample is required.

The above CAR form also provided indication that the following should be included:

- Sample preservation measures
- QA procedures – reviewing analysis etc

- Records for training etc
- Procedure for notification to NRW in the event of a failure / exceedance
- Storage conditions and transport of samples

Although some of these aspects have been mentioned, the level of detail is deemed as insufficient. The procedure is still lacking many aspects.

Action 6 – Egan Waste – 27th February 2026: Egan Waste to review and update their sampling procedure to incorporate the requirements of the guidance. Provide NRW with a copy of the procedure once complete. Additionally, Egan waste should determine a plan to evaluate the homogeneity of the waste water discharges, provide a copy of this plan to NRW. **Due 30/04/2026.**

Action 7 – Egan Waste – 27th February 2026: Egan Waste to commence sampling of each batch discharge in line with permit requirements immediately. Where improvements are identified as the procedure is updated, these should be implemented on a rolling basis, however, all batch discharges should now be sampled in line with the permit frequency. Provide NRW with confirmation that sampling will commence. **Due 02/03/2026**

Improvement condition 8

In CAR_NRW0046402 a deadline was imposed on the operator to complete all of the resurfacing works, in relation to IC8 by the 30/06/2025. The original deadline for completion of the IC was the 17th of February 2022 however, several extensions had been previously granted. An email was received on the 24/02/2026 from Egan Waste confirming that the re-surfacing works have **not** been completed. Failing to implement this improvement condition over a prolonged period has increased the risk of potential pollution to soil and groundwater. Any surface on site that is not impermeable can provide a pathway for pollutants to enter the ground, the risk of this occurring increases the longer the pathway exists. Ample opportunity has been provided for the operator to undertake the resurfacing works, three years have now elapsed since the original deadline. This is seen as a significant non-compliance, as there is potential for significant environmental impact.

Further investigation has identified that the operator is storing and treating waste outside, which is clearly identifiable on satellite imagery of the facility, with large piles of waste seen in the South / South East corner of the site. The permit is explicit in that all waste, hazardous or non-hazardous, **must be stored and treated within a building on an impermeable surface with sealed drainage**, this is highlighted in Table S1.1 and is linked to the permitted activities permit condition 2.1 and has been a condition of the permit since it was first issued.

The potential environmental risk of failing to comply with this permit condition is increased with the failure to implement improvement condition 8 and the general failure to maintain the integrity of the impermeable surface across the facility. Wastes stored and treated outdoors are exposed to rain and can release pollutants into stormwater and exposure can lead to pollutants being leached from the waste. Deficiencies with the site surfacing can provide a pathway for contaminated water and pollutants to enter the soil and groundwater.

Further to the above, it is a requirement of BAT for operational areas of the site to have impervious surfacing and have procedures in place for the regular inspection and maintenance for all aspects of the sites 'containment' measures, which should include the impervious surfacing. If containment capability is compromised by damage or deterioration, waste should be immediately removed until the repair is complete. This is a requirement of the Sector guidance note – '*S5.06 Guidance for the Treatment and Transfer of Hazardous Waste*' which forms part of the permitted operating techniques as per the permit application. Pollution incidents are often a result of poor maintenance failures of plant or infrastructure such as impermeable surfaces, whereby pollution arises

from a containment failure

Non-compliance scoring is based on the **potential** impact to the environment, people or property. The above permit non-compliances are seen as significant. The site is operating in breach of the permit, has compromised containment measures and the site receives and handles hazardous wastes, the loss of which could result in a significant impact to soil and groundwater. As such, the following non-compliance scores will be issued.

Non-compliance: A Category 2 non-compliance is issued for failing to complete the resurfacing works in accordance with improvement condition 8 within numerous deadlines. Permit condition 2.6.1.

Non-compliance: A Category 2 non-compliance is issued for failing to operate in accordance with the permitted activities of the permit, namely, the storage and treatment of waste outside of a building without an impermeable surface. Permit Condition 2.1.1.

The above non-compliances are also subject to non-compliance scoring in relation to their respective root causes, however, further information is required in order to identify the root causes.

Action 8 Egan Waste – 27th February 2026: Complete improvement condition 8 and provide an engineering report demonstrating conformance to CIRIA 736 or an equivalent engineering standard. **Due 31/03/2026**

Action 9 Egan Waste – 27th February 2026: Egan Waste to terminate any further waste storage and treatment operations taking place outside of a building **immediately** and remove any waste currently stored in this manner. Provide NRW with confirmation once complete. **Due 31/03/2026**

Action 10 Egan Waste – 27th February 2026: Egan Waste to investigate and provide an explanation as to why waste storage and treatment is taking place outside of a building and determine what steps are required to return to compliance. Provide NRW with a response of your findings and intended steps to return to compliance. **Due 31/03/2026**

Action 11 Egan Waste – 27th February 2026: Egan Waste to provide a copy of the sites planned preventive maintenance schedule. **Due 31/03/2026**

Egan Waste have stated that the re-surfacing works are to be completed by the 31/03/2026. However, a **Warning Letter** will be issued for failing to undertake the resurfacing works and for failing to comply with the permitted activities. Should the resurfacing works not be completed by the 31/03/2026 and/or waste continues to be stored and treated in a manner which is not compliant with the permit, further enforcement action will be taken.

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.