

Compliance Assessment Report CAR_NRW0051030

Permit being assessed: DB3295CU.

For: Circular Waste Solutions – Liquid Waste Treatment Facility, **held by:** Circular Waste Solutions Limited

At: The Treatment Works, Titanium Road, Westfield Industrial Park, Swansea, Swansea, SA5 4SF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2025.

Parts of permit assessed: 2025 Annual Monitoring Returns.

NRW Lead Officer: Daren Pike.

Report sent to: Pete Jones, Managing Director, on 13/03/2026.

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	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	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**Introduction**

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2025 annual monitoring returns by Circular Waste Solutions, Liquid Waste Treatment Facility, Titanium Road, Waunarlwydd, SWANSEA, SA5 4SF under permit EPR-DB3295CU.

Point Source Emission to Air Parameters (Air 1 Form) as required by condition 3.5.1

The annual submission for emissions to air records that all monitoring samples were within permit limits.

Point Source Emission to Water Parameters (Water 1 Form) as required by condition 3.5.1

The annual submission included results for all parameters required over the period. The reported values for Hydrocarbon Oil Index (HOI) are in excess of the ELV recorded in the permit. ELV is 10 mg/l and the recorded value dated 10 August 2025 was 89.2 mg/l. The provided data was annotated with 'Downstream abatement as agreed with NRW'. Permit footnote 3 states 'The BAT-AELs may not apply if the downstream waste water treatment plant abates the pollutants concerned, provided this does not lead to a higher level of pollution in the environment'.

The operator has provided evidence that the breached ELV of 89.2 mg/l has been abated by the DCWW treatment works prior to discharge.

Annual Water / Energy Use, Production & Waste as required by condition 4.2.2

The annual production/treatment data specified in Table S2 were also received and include the reporting parameters specified in the permit.

This CAR was completed on 13 March 2026. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS is 31 December 2025. The Annual return / Report is shown below and is attached.

Permit Number: DB3295CU Operator: Circular Waste Solutions Limited
 Facility: Liquid Waste Treatment Facility Form Number: Air1 / 16/08/24

Reporting of emissions to air for the period from 01/01/25 to 31/12/2025

Emission Point	Substance / Parameter	Emission		Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
		Limit Value	Reference Period				
A1	Hydrogen chloride (HCl)	5 mg/m ³	Once every six months	0.11	EN 1911	28/10/2025 10:33-11:33	
A1	TVOC	20 mg/m ³	Once every six months	1.41	EN 12619	8/4/2025 12:50-13:50	
A1	NH ₃	No limit set	Once every six months	<0.04		28/10/2025 11:51-12:51	
A4	Hydrogen chloride (HCl)	5 mg/m ³	Once every six months	<0.02	EN 1911	29/10/2025 9:10-10:10	
A4	TVOC	20 mg/m ³	Once every six months	9.78	EN 12619	29/10/2025 10:26-11:26	
A4	NH ₃	No limit set	Once every six months	<0.04		29/10/2025 10:11-11:11	
A5	Hydrogen chloride (HCl)	5 mg/m ³	Once every six months	<0.2	EN 1911	28/10/2025 14:30-15:30	
A5	TVOC	20 mg/m ³	Once every six months	1.2	EN 12619	9/4/2025 10:00-11:00	
A5	NH ₃	No limit set	Once every six months	<0.05		9/4/2025 10:00-11:00	
A6	Hydrogen chloride (HCl)	5 mg/m ³	Once every six months	<0.02	EN 1911	9/4/2025 13:15-14:15	
A6	TVOC	20 mg/m ³	Once every six months	1.78	EN 12619	29/10/2025 11:18-12:18	
A6	NH ₃	No limit set	Once every six months	<0.05		9/4/2025 13:15-14:15	

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
 [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
 [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
 [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.
 Signed P.A Jones Date: 26/1/2026
 (Authorised to sign as representative of Operator)

Permit Number: DB3295CU Operator: Circular Waste Solutions Limited
 Facility: Liquid Waste Treatment Facility Form Number: Sewer1 / 16/08/24

Reporting of emissions to sewer for the period from 01/01/2025 to 31/12/2025

Emission Point	Substance / Parameter	Emission		Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
		Limit Value	Reference Period				
S1	Adsorbable organically bound halogens (AOX).	1 mg/l	Once every day	n/a	EN ISO 9562		
S1	Benzene, toluene, ethylbenzene, xylene (BTEX).	None set	Once every month	0.45mg/l	EN ISO 15680	June Composite	
S1	Free cyanide (CN-).	0.1 mg/l	Once every day	n/a	Various EN standards available (i.e. EN ISO 14403-1 and -2)		
S1	Hydrocarbon oil index (HOI).	10 mg/l	Once every day	89.2 mg/l* Downstream abatement as agreed with NRW.	EN ISO 9377-2	10/8/25	
S1	Arsenic (As).	0.1 mg/l	Once every day	n/a	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)		

Emission							
Emission Point	Substance / Parameter	Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
S1	Cadmium (Cd).	0.1 mg/l	Once every day	0.08mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	19/7/25	
S1	Copper (Cu).	0.5 mg/l	Once every day	0.477mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	11/3/25	
S1	Nickel (Ni).	1 mg/l	Once every day	0.994mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	15/10/2025	
S1	Lead (Pb).	0.3 mg/l	Once every day	0.27mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	18/3/2025	
S1	Zinc (Zn).	2 mg/l	Once every day	1.98mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	20/8/2025	

Emission							
Emission Point	Substance / Parameter	Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
S1	Manganese (Mn).	None set	Once every day	2.27mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	29/7/2025	
S1	Hexavalent chromium (Cr(VI)).	None set	Once every day	0.29mg/l (total Cr)	Various EN standards available (i.e. EN ISO 10304-3, EN ISO 23913)	1/8/2025	
S1	Mercury (Hg).	10 µg/l	Once every day	n/a	Various EN standards available (i.e. EN ISO 17852, EN ISO 12846)		
S1	PFOA.	None set	Once every six months	0.15ug/l	No EN standard available	6 month composite Jul-Dec 25.	
S1	PFOS.	None set	Once every six months	<0.1ug/l	No EN standard available	6 month composite Jan-Jun 25.	

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed P.A Jones.....
 (Authorised to sign as representative of Operator)

Date...26/1/2025.....

Permit Number: DB3295CU Operator: Circular Waste Solutions Limited
 Facility: Liquid Waste Treatment Facility Form Number: WaterUsage1 / 16/08/24

Reporting of Water Usage for the year 2025

Water Source	Usage (m ³ /year)	Specific Usage (m ³ /unit output)
Mains water	3257M3	
TOTAL WATER USAGE	3257M3	

Operator's comments :

SignedP.A.Jones..... Date...26/1/2026.....
 (authorised to sign as representative of Operator)

Permit Number: DB3295CU Operator: Circular Waste Solutions Limited
 Facility: Liquid Waste Treatment Facility Form Number: Energy1 / 16/08/24

Reporting of Energy Usage for the year 2025

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh 61.13	146.71	
Natural Gas	MWh	N/A	
TOTAL	-		

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments :

SignedP.A.Jones..... Date.....26/1/2025.....
 (Authorised to sign as representative of Operator)

Permit Number: DB3295CU Operator: Circular Waste Solutions Limited
 Facility: Liquid Waste Treatment Facility Form Number: Performance1 / 16/08/24

Reporting of other performance indicators for the period 01/01/2025 to 31/12/2025

Parameter	Units
Total raw material used	73.38 tonnes
Generation of residues	328.42 tonnes
Generation of waste water	16,716M ³

Operator's comments :
 Waste water generated is as a result of incoming waste liquids, and site rainwater.

Signed P.A.Jones Date 26/1/2025
 (Authorised to sign as representative of Operator)

If you have any queries about this report, or wish to discuss completion of any actions, please contact NRW.

Daren Pike
 Senior Officer Industry Regulation Team
daren.pike@cyfoethnaturiolcymru.gov.uk

END OF REPORT

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.