

## Compliance Assessment Report CAR\_NRW0051564

**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:** Site Inspection,

**Reason:** Routine.

**On:** 10/02/2026 between 10:00 and 12:00.

**Parts of permit assessed:** S1 Emissions to sewer, General site condition.

**NRW Lead Officer:** Daren Pike.

**Report sent to:** Pete Jones, Managing Director, on 21/04/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2B - Installations - Operations - The site	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
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

### Inspection Details

- **Attending Officer:**  
**Daren Pike**  
Senior Officer, Industry Regulation Team
- **Person(s) Met:**  
Managing Director
- **Date of Visit:**  
**10 February 2026**
- **Time:**  
**10:00 hrs – 12:00 hrs**
- **Type of Inspection:**  
General Compliance Inspection with targeted focus on **S1 – Emissions to sewer**

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### Purpose of Inspection

The purpose of the site visit was to:

- Undertake a general inspection of site condition and management; and
- Assess compliance with permit requirements relating to **emissions to sewer (S1)**, including effluent treatment infrastructure, controls, and management arrangements.

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### Site Description and Activities

The facility operates as a hazardous and non-hazardous liquid waste storage and treatment installation, permitted to treat up to 32,000 tonnes per annum. Liquid wastes are treated through physico-chemical processes prior to discharge of treated effluent to the Dŵr Cymru Welsh Water (DCWW) foul sewer via the permitted **S1 discharge point**.

The treatment process includes:

- Oil/water separation;
- Aqueous treatment using reactor vessels;
- Settlement, blending and testing within the effluent treatment plant;
- Final effluent storage prior to controlled discharge to sewer.

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## General Site Condition and Management

The site was observed to be well ordered and well managed at the time of inspection.

Key observations included:

- Clear segregation and demarcation between operational areas;
- Good housekeeping standards across the site;
- Bunded and contained treatment and storage areas;
- No visible evidence of leaks, uncontrolled discharges, or staining associated with effluent handling.

Site presentation and organisation were consistent with the requirements of **Permit Condition 1.1 (General Management)**.

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## Health and Safety Observations

The inspection identified clear and appropriate Health and Safety measures, including:

- Fire-fighting equipment positioned at suitable locations;
- External emergency shower areas for chemical contamination response;
- On-site first aid facilities.

These measures demonstrate a proactive approach to managing operational risks associated with liquid waste treatment.

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## Emissions to Sewer (S1) – Inspection Findings

### Permitted Discharge

The permit authorises a discharge of treated effluent to the foul sewer at emission point **S1**, subject to limits and monitoring requirements set out in **Schedule 3, Table S3.2**.

### Observations

During the inspection:

- The effluent treatment plant was observed to be operating under normal conditions;
- Final effluent tanks were in use for settlement, blending and testing prior to discharge;
- No evidence was observed of uncontrolled discharges, bypassing of treatment systems, or visible non-compliant effluent;
- Secondary containment and hardstanding were present around effluent handling

areas, reducing the risk of fugitive releases.

Operational arrangements appeared consistent with the description of activities within the permit.

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### **Monitoring and Management of S1 Emissions**

Discussions with the Managing Director confirmed that:

- Effluent monitoring is undertaken in line with permit requirements;
- Sampling and analysis are conducted prior to discharge to sewer;
- Results are retained and reported in accordance with permit conditions;
- Awareness of permit limits and reporting obligations was demonstrated.

No concerns were raised during the inspection in relation to the management or control of emissions to sewer.

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### **Compliance Assessment**

Based on the site inspection and discussions held:

- The operator appeared to be compliant with permit requirements relating to emissions to sewer (S1);
  - The effluent treatment and discharge arrangements observed were consistent with the permitted operating techniques;
  - No permit breaches or incidents were identified at the time of the visit.
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### **Actions and Recommendations**

- No enforcement or corrective actions were required following this inspection.
  - The operator should continue to:
    - Maintain effective operation of the effluent treatment plant;
    - Undertake monitoring at the frequencies specified within the permit;
    - Ensure continued compliance with discharge limits and reporting requirements.
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### **Overall Conclusion**

The inspection identified a well-managed installation with appropriate systems and controls in place for the management of emissions to sewer. At the time of the inspection, the operator was assessed as being compliant with Permit EPR/DB3295CU, including

conditions applicable to emission point S1.

**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](mailto: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](mailto: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.