

Compliance Assessment Report CAR_NRW0051566

Permit being assessed: BW0886IZ.

For: Milford Haven Ceramics EPR/BW0886IZ, **held by:** CBL Ceramics

At: Milford Haven Ceramics Marble Hall Road , Steynton, MILFORD HAVEN, Dyfed, SA73 2PP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/03/2026 between 10:00 and 13:00.

Parts of permit assessed: S1 Emissions to sewer. General site conditions .

NRW Lead Officer: Daren Pike.

Report sent to: Barbara A Abeles, 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**1. Inspection Details****Installation:**

CBL Ceramics Limited
Marble Hall Road
Milford Haven
Pembrokeshire
SA73 2PP

Permit Reference:

BW0886IZ

Regulated Activity:

Manufacture of ceramic components involving the use of beryllium oxide
(Schedule 1, Section 4.2 Part A(1)(d), PPC Regulations)

Visit Information

- **Attending Officer:**
Daren Pike
Senior Officer, Industry Regulation Team
 - **Person Met:**
Managing Director
 - **Date of Visit:**
25 March 2026
 - **Time:**
10:00 hrs – 13:00 hrs
 - **Type of Visit:**
Routine compliance inspection, including targeted assessment of water-related emissions and effluent management.
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2. Purpose of Inspection

The inspection was undertaken to:

- Assess general compliance with the conditions of Permit BW0886IZ.
 - Review site management, housekeeping, and environmental controls.
 - Undertake a focused review of water-related emissions, with particular reference to:
 - Effluent management arrangements associated with the reed bed treatment system.
 - Controls and monitoring relevant to permitted discharges to sewer (reference S1).
 - Confirm that there was no unauthorised discharge to surface water.
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3. General Site Condition and Management

The site was observed to be well ordered, tidy, and professionally managed.

- Good standards of housekeeping were evident across the installation.
- There were no signs of uncontrolled waste storage, spillages, or poor containment.
- The Managing Director demonstrated a clear understanding of:
 - The site's environmental responsibilities.
 - Permit requirements.
 - The importance of controlling risks associated with beryllium oxide.

The site operates an internally audited environmental management system, consistent with the expectations of condition **1.3.1 of the Permit**.

4. Health, Safety and Workforce Controls (Observational)

While not the primary purpose of the visit, the following were noted:

- Fire-fighting equipment was present, accessible, and clearly identified.
- First-aid provisions were in place.
- Staff are subject to regular occupational health medicals, which is particularly relevant given the hazardous nature of beryllium compounds.

No issues were observed that would present an indirect environmental risk.

5. Emissions to Water and Sewer – S1 Focus

5.1 Permit Context

Process effluent is managed as follows:

- Effluent is treated via a reed bed treatment system.
- Treated effluent is discharged to sewer at **emission point S1**.
- Discharges to sewer are subject to limits, including:

- Beryllium and its compounds (as Be): 5 mg/l (maximum value)
(Condition 2.2.2.8 / Table 2.2.8)
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5.2 Infrastructure and Controls

- The effluent treatment and collection infrastructure appeared intact and fit for purpose.
 - No visible leaks, overflows, or signs of failure were observed.
 - There was no evidence of bypassing of the reed bed system.
 - No staining, odour, or visual indicators of pollution were identified during the inspection.
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5.3 Operational Management and Monitoring

- The Managing Director confirmed that effluent monitoring is undertaken in line with permit requirements.
- There were no reported incidents, abnormal emissions, or exceedances associated with the effluent system.
- Monitoring arrangements align with:
 - **Condition 2.10.1** (emissions monitoring programme).
 - **Schedule 2** reporting requirements for emissions to sewer (S1).

A detailed audit of analytical data was not undertaken during this visit.

5.4 Environmental Impact

At the time of inspection:

- There was no evidence of unauthorised discharges.
 - There was no observable impact on the receiving sewer or surrounding environment.
 - The site remained compliant with the prohibition on emissions to surface water.
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6. Compliance Summary

Based on observations made during the inspection:

- The installation appeared to be operating in accordance with Permit BW0886IZ.
- No non-compliances were identified.
- Controls relating to effluent generation, treatment, and discharge were considered adequate and well managed.

- Management systems were consistent with the overarching requirements of **condition 1.3.1.**
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7. Actions and Recommendations

Regulatory Actions

None required as a result of this inspection.

Advisory Points

- Continue routine inspection and maintenance of effluent treatment and containment systems.
 - Maintain monitoring records in accordance with permit conditions and ensure continued readiness for inspection.
 - Continue current standards of housekeeping and management oversight.
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8. Officer Conclusion

The site was found to be well managed, with appropriate control of environmental risks.

No evidence was observed of:

- Unauthorised emissions to water.
- Failures in effluent treatment or sewer discharge controls.
- Breaches of permit conditions.

No enforcement or follow-up action is recommended at this time.

Report completed by:

Daren Pike
Senior Officer, Industry Regulation Team

Report date:

21 April 2026

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.