

Compliance Assessment Report CAR_NRW0051694

Permit being assessed: AB3092FR.

For: Llantrisant Recycling, **held by:** Llantrisant Recycling Centre Limited

At: Llantrisant Recycling, Pantybrad Lane, Llantrisant, Pontyclun, CF72 8YY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/02/2026 between 13:25 and 14:40.

Parts of permit assessed: W1A, W3G, W2A.

NRW Lead Officer: Daniel Hopkin, accompanied by Laoni Tye, Marc Campbell.

Report sent to: George Harvey , Technically Competent Manager , on 08/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W3G - Waste - Emissions and monitoring - Fire	C2 Significant	3.6.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W1A - Waste - Management - General management	C3 Minor	1.1.1
W2A - Waste - Operations - Permitted activities	C3 Minor	2.1.1

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

Total non-compliances recorded	Total non-compliance score
4	43

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
W3G	Ensure all waste is being stored and managed in accordance with your permit and FPMP.	29/05/2026
W1A	Ensure you are operating in line with your EMS.	29/05/2026

Criteria	Action needed	Complete by
W1A	Please repair the site boundary netting to avoid any litter leaving site.	29/05/2026
W2A	You must cease shredding of mattresses on the site immediately. Should you wish to shred mattresses you will need to apply for a permit variation to include these activities.	11/05/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Llantrisant Recycling Centre Limited – EPR/AB3092FR

Waste Regulation Officers Daniel Hopkin, Marc Campbell and Senior Waste Regulation Officer Laoni Tye attended the permitted facility of Llantrisant Recycling Centre Limited at Pantybrad Lane, Llantrisant, Pontyclun, CF72 8YY on the 12th of February 2026. Llantrisant Recycling Centre hold a Tier 3 bespoke permit for their site. This was a routine unannounced site inspection. We were met by the Site manager Howard Oaks and the site Technically Competent Manager (TCM) George Harvey, who showed us around the site and answered our questions. The weather was wet with little wind during the visit. We arrived at 13:25.

There were multiple breaches recorded during the visit that are detailed below.

W3G Fire – Category 2 (C2) Breach

Permit condition 3.6.1 states - The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention and mitigation plan guidance.

We have issued you with a Category 2 breach of your permit under sub-criteria W3G Fire, due to waste not being stored and managed in line with your Fire Prevention and Mitigation Plan (FPMP).

During the site inspection, we observed mixed waste stockpiles exceeding the permitted maximum height of 4 metres. Several stacks were approximately 5 - 6 metres in height, as shown in photograph 1, 2 and 3. Waste was being stored higher than the concrete block walls. These walls are required to maintain a minimum 1 metre freeboard above the waste

to prevent fire spread between stockpiles. There were also insufficient fire breaks between the open sides of the stockpiles, with waste spilling out of the bays, the FPMP guidance and the FPMP on site stipulates a minimum of 10 metres. Due to the inadequate fire breaks, the waste in this area would be considered a single large stockpile. In the event of a fire, rapid spread across the pile would be likely. NRW have issued you with this breach in the past in CAR_NRW0041920.



Photo 1



Photo 2



Photo 3

The waste was visibly seen steaming in several areas, the FPMP states visual monitoring will be undertaken daily and states, *'The visual monitoring will look for signs of heating within the waste piles such as accumulations of condensation within plastic materials, steam being produced from the stockpiles and scorch marks on material brought out from within the piles. If any of these signs of heating are noted, then the waste pile will be split into smaller piles, cooled down with clean water sprays (if required) and removed from site.'*

Your FPMP also states, *'If steam or condensation is noticed or even if signs of melting or charred material is seen within the waste, this would initiate a review of the policies and procedures set out within this FPMP. The sections of the plan that would be reviewed in this type of situation would be stack sizes and separation distances, the waste storage time, frequency of monitoring, the type of monitoring being undertaken (i.e. would more extensive equipment be needed) and the preventing fire section to ensure that the measures being taken are still adequate. If these signs are noticed within the daily site checks, the environmental manager will be informed and will contact NRW. At this point waste inputs are to be stopped until the waste has been safely removed from site and NRW are in agreement for waste to be imported once more.'* This has been identified as a risk but the measures within the plan have not been carried out.

We also witnessed plant operating directly on top of the waste compacting it down (photo 4 below). Vehicles working on top of a waste pile increases fire risk acting as an ignition point. The FPMP on site identifies hot exhausts as a fire risk and states:

<p>Hot exhaust system/heat sources</p>	<p>All relevant staff that are trained in the use of the machinery are made aware of the risks that the exhaust system poses with relation to causing a fire. The gaps that are implemented between the waste stockpiles are sufficient to allow for all vehicles to turn without the risk of getting too close to the waste mass. Additionally, the mobile plant on site can be fitted with small fire extinguishers in the event of a small fire caused by the exhaust.</p>
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Using machinery to compact material down has not been included in the sites FPMP or other management system and in which case, consideration of the associated risk, additional waste volumes within the bays and the potential impacts that will have on fire prevention and mitigation has not been considered. This would, as a minimum, have likely implications on the amount of water required to fight a fire as well as the capacity of the quarantine area.



Photo 4

Action: Ensure all waste is being stored and managed in accordance with your permit and FPMP.

W1A General Management – Category 3 (C3) ROOT CAUSE Breach

Permit condition 1.1.1 states - The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the

operator as a result of complaints;

We have issued you with a C3 breach of your permit under sub-criteria W1A General Management, as a root cause breach due to you not following your own Environmental Management System (EMS).

During the inspection it became clear that you were not following your own procedures on site, equipment failure became a large part of the waste stock piling issue, your EMS states 7.1 *“Breakdowns and spillages - In the event of breakdown of the loading plant an alternative loading shovel or excavator will be brought on site until it is repaired. If an alternative machine cannot be used then waste will be stored until the plant is repaired. In the event of a long-term breakdown of the loading plant an alternative machine will be brought on site until the faulty unit is repaired.”*

You explained that the shredding machine had broken down and this impacted your ability to shred material to remove from site. The waste had been sitting for too long on site and had started to degrade.

Additionally, waste was not being stored in line with your own EMS as stated in 3.5 *Product Storage – “Materials will be stored within the reception areas. Regular weekly collections will be booked in to ensure that the waste volumes do not build up unnecessarily. Despite the incoming waste being regular, Llantrisant Recycling will always ensure that the weekly input tonnage will be removed within a 6-week period where practical. This will maintain a consistently low level of tonnage being held on site at any one time. The whole site measures approximately 120m x 110m (13,200m²) consequently has the storage capacity for large waste stockpiles to be held within the site. The storage of the waste will be in accordance with the Fire Prevention & Mitigation Plan guidance (Appendix 2). The stockpiles will have a suitable gap enabling FRS and machine access. No waste will be stored in within a dedicated quarantine area(s) and the waste will also not be stored on site for longer than required.”*

Action: Ensure you are operating in line with your EMS.

Additionally, during the inspection, we discussed the damaged boundary netting (see photo 5 below). We understand that Llantrisant Recycling Centre plans to construct a new building that will fully contain waste across the site. However, until this is completed, the boundary netting must remain intact and maintained to prevent any waste from leaving the site, particularly during periods of high winds.

The *How to Comply with Your Environmental Permit* guidance (Waste Operations, page 44) states under *Dust, Mud and Litter* that operators should erect litter fences around the site - which you have already done. It is therefore important that these measures are maintained to ensure they continue to be effective.



Photo 5

Action: Please repair the site boundary netting to avoid any litter leaving site.

W2A Permitted Activities – Category 3 (C3) Breach

Permit condition 2.1.1 states - The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

We have issued you with a C3 breach of your permit under sub-criteria W2A Permitted Activities, due to the ongoing processing of mattresses at the site.

During the inspection we discussed the shredded mattresses on site (photo 6 below), you told us that mattress shredding is done almost daily. This is not a permitted activity within your permit. This has been explained to the operator in previous Compliance Assessment Forms, I have added the information below.



Photo 6

CAR_NRW0039414 - received 17/02/2022

“Mattresses are being stored on site adjacent to the Terex shredder. We were advised that there is no treatment of waste mattresses on site, this is not a permitted activity.”

CAR_NRW0041920 - received 14/07/2023

“Mattress treatment - Following the last inspection and subsequent discussions around whether mattress treatment is permitted or not. We can confirm that mattress treatment is not permitted, due to reasons already outlined in that this was not applied for at the time of the variation as mattresses were for bulking only. We do however acknowledge that this should have been restricted within the permit under operating techniques. We will therefore need to carry out an NRW led variation to prohibit this activity which will be carried out by the permitting team. You can apply to include this treatment activity as part of your next variation application. In the meantime, you should not be treating mattresses on site as the environmental risks associated with this activity (and health risks) have not been assessed.”

Action: You must cease shredding of mattresses on the site immediately. Should you wish to shred mattresses you will need to apply for a permit variation to include these activities.

Advice and Guidance – Odour

During the site inspection, a strong odour was detected. The presence of on-site odour indicates the potential to impact local amenities off site if odour is not effectively managed. An odour was identified from the waste stored on site. The waste had not been managed effectively, and material allowed to sit and heat over time had generated a noticeable odour.

Action: Ensure you are following your odour management systems to manage odour on site. Please ensure you have an odour management plan in place for the whole site and not only the composting activities.

Thank you for your time during the inspection. The site inspection concluded at 14:40.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin

Daniel.Hopkin@cyfoethnaturiolcymru.gov.uk

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 Waste compliance criteria (used in section 1 and 2):**1. Management**

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.