

Compliance Assessment Report CAR_NRW0051674

Permit being assessed: EP3935UC.

For: Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

At: Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/03/2026.

Parts of permit assessed: 3. Emissions and Monitoring, 4. Information.

NRW Lead Officer: Kirsty Thomas.

Report sent to: Swan Alloy UK Ltd, HSE Manager, on 29/05/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(1)	Action Ref - CAR_NRW0051674.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the aluminium exceedance incident.	05/06/2026

Criteria	Action needed	Complete by
IR4B	Action Ref - CAR_NRW0051674.2 - Swan Alloy must submit revised waste returns for Q1 2026 ensuring the form is complete and correctly formatted.	05/06/2026

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

This CAR form has been issued in response to the submission of the Q1 2026 monitoring returns by the operator (Swan Alloy UK Limited) for activities at Waunarlwydd Works, Swansea, SA5 4SF under permit number EPR-EP3935UC.

Q1 2026 Monitoring returns

Q1 2026 monitoring returns submitted as required by Condition 4.2.3. Monitoring returns include emissions to air (emission point A4) and emissions to surface water (emission point WA1) as emissions listed in Schedule 3 of the environmental permit.

Emissions to air (emission point A4) - Reporting form A1 21/02/2023

- The Q1 submissions included the results for all parameters with a quarterly, bi-annual and continuous monitoring frequency required over this period (Particulate Matter, Oxides of Nitrogen (as NO₂), Hydrogen Chloride, Volatile Organic Compounds, Sulphur Dioxide, and Hydrogen Fluoride) as specified in Table S3.1.
- Monitoring results for Hydrogen Fluoride were carried out using test method CEN TS 17340 rather than the test method listed in the permit, Table S3.1 (BS ISO 15713 and MID). However it is acknowledged that test method CEN TS 17340 is suitable for monitoring of hydrogen fluoride. The operator must ensure that any future variation to Environmental Permit incorporates this monitoring method within Table S3.1.
- The reported emissions were within emission limits specified in the permit for the Q1 monitoring period.

Emissions to water (emission point WA1)

- The Q1 submissions included the results for all parameters specified in Table S3.2.
- The reported emissions were within emission limits specified in the permit for the Q1 monitoring period with the exception of the following:
 - Aluminium - February 2026
 - A Schedule 5 Notification was submitted for this permit limit exceedance.

- No results were available for March - Insufficient quantity of water available.

Schedule 5 Notification - February 2026

On the 25th March 2026, the operator submitted a Schedule 5 Notification detailing an exceedance of an emission limit at WA1.

A sample result of 5.94mg/l of aluminium was recorded (sample taken 26th February 2026). As per Table S3.2, emission point WA1 for aluminium shall not exceed 1.5mg/l and therefore not in compliance.

Part B of the Schedule 5 Notification detailed further measures to prevent pollution including:

- Escalation to management team. Corrective and preventative actions to be discussed.
- Repeat sampling arranged- Sample results from April 2026 show aluminium to be back in compliance with the permit limit.
- Daily housekeeping regimes in place with 3rd party jet sweeper.
- External provider to attend site for cleaning.

Compliance breach - Swan Alloy has failed to comply with the aluminium emission limit of 1.5mg/l as specified in Schedule 3, Table S3.2. This is a contravention of condition 3.1.2 of the permit. Consequently, a non-compliance score of C3 has been attributed against compliance criteria IR3A(1) - Emissions to Water.

Action Ref - CAR_NRW0051674.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of aluminium exceedance incident.

NOTE - There have been several recent incidents involving permit level exceedances at emission point WA1. A previous action set by NRW that remains outstanding is action CAR NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the oil and grease exceedance incident . A response must be provided immediately. NRW has also recently raised concerns regarding the site's interceptor prior to discharge. NRW's comments on this are captured in the waste audit compliance report - CAR NRW0051598 following an on site inspection of the interceptor.

Waste returns

Condition 4.2.5 of the permit requires Swan Alloy to report the waste accepted and removed from the site during the previous quarter; if during that quarter the total amount accepted exceeds 100 tonnes of non-hazardous waste or 10 tonnes of hazardous waste. Information must be supplied within 1 month of the end of each quarter using the forms made available for the purpose.

Swan Alloy have submitted waste return information as required by condition 4.2.5. However, the waste returns submitted are incorrectly formatted and incomplete in places.

Action Ref - CAR_NRW0051674.2 - Swan Alloy must submit revised waste returns for

Q1 2026 ensuring the form is complete and correctly formatted.**Previous CAR Form actions yet to be completed:**

Action	Details	Status
Previous CAR Form actions - CAR_NRW0049879		
2	Action Ref - CAR_NRW0049879.2- Provide Certificates of Technical Competence (CoTC) (for the operator) of an appropriate and approved competence scheme as required by condition 1.1.4.	Due 31/08/2026 - in progress
Previous CAR Form actions - CAR_NRW0050552		
1	Action Ref - CAR_NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the oil and grease exceedance incident	<u>Overdue</u>
Previous CAR Form actions - CAR_NRW0051688		
2	ACTION - Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests. particularly flies. Submit PMP to NRW.	Due 21/05/2026 - <u>Overdue</u>
Previous CAR Form actions - CAR_NRW0051598		
1-15	Action Ref - CAR_NRW0015198.1 - CAR_NRW0015198.15. See report for details	27/05/2026 (submission made - pending NRW review)

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.