

Compliance Assessment Report CAR_NRW0051574

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: Report/Data Review,

Reason: Routine.

On: 21/04/2026.

Parts of permit assessed: W3E.

NRW Lead Officer: Daniel Hopkin.

Report sent to: George Harvey , TCM , 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
W3E - Waste - Emissions and monitoring - Monitoring	C3 Minor	3.7.1
W3E - Waste - Emissions and monitoring - Monitoring	Action only (X)	
W3E - Waste - Emissions and monitoring - Monitoring	Action only (X)	
W3E - Waste - Emissions and monitoring - Monitoring	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
W3E	You must return to undertaking bioaerosol monitoring in accordance with the requirements of the permit (Table S4.1). Should you wish to agree to alternative monitoring periods we will assess this request following the submission of 12 months	22/04/2026

Criteria	Action needed	Complete by
	of bioaerosol monitoring. Please submit this request in writing, and NRW will review it. Please ensure all monitoring is representative of typical and higher risk operational conditions, including periods of increased activity and seasonal variation, and must be carried out during composting activities likely to generate airborne bioaerosols and when materials on site are at or near maximum operational capacity. Please ensure that monitoring is conducted 3 times in 2026 to remain compliant with your permit.	
W3E	Bioaerosol monitoring period 1st January – 30th April 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).	28/05/2026
W3E	Bioaerosol monitoring period 1st May – 31st August 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).	28/09/2026
W3E	Bioaerosol monitoring period 1st September – 31st December 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).	28/01/2027

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.

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

Llantrisant Recycling Centre Limited – EPR/AB3092FR

Llantrisant Recycling Centre Limited holds a Tier 3 bespoke permit for the site at Pantybrad Lane, Llantrisant, Pontyclun, CF72 8YY. This Compliance Assessment Report (CAR) is a follow-up to CAR_NRW0050261, which requested submission of the site's bioaerosol monitoring reports. This report details our findings following review of the information provided.

There has been a breach identified that is detailed below.

W3E Monitoring – Category 3 (C3) Breach

Permit condition 3.7.1 states - The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:

(a) process monitoring specified in table S3.1;

(b) bioaerosol monitoring specified in table S3.2.

Table S3.2 Bioaerosol monitoring requirements					
Location or description of point of measurement	Parameter	Bioaerosol threshold limits CFU m ⁻³	Monitoring frequency	Monitoring standard or method	Other specifications
Bioaerosols shall be monitored: - upwind of the operational area and - downwind of the operational area; in accordance with "M9 – Technical Guidance Note (Monitoring) – Environmental monitoring of bioaerosols at regulated facilities, 2018 Version 2".	Total bacteria	1000	Quarterly	In accordance with "M9 – Technical Guidance Note (Monitoring) – Environmental monitoring of bioaerosols at regulated facilities, 2018 Version 2" unless otherwise agreed in writing by Natural Resources Wales.	As described M9 Technical Guidance Note, including all the additional data requirements specified therein.
	Aspergillus Fumigatus	500			

We have issued you with a C3 breach of your permit under sub criteria W3E Monitoring, due to the lack of bioaerosol monitoring that has taken place in the 2025 period.

Following your submission of bioaerosol monitoring data for 2024 and 2025, we have reviewed the results and determined that:

Ambient bioaerosol monitoring was carried out over the following periods:

- 08:37 and 10:49 on the 24th October 2024,
- 08:35 and 10:48 on the 29th November 2024,
- 10:06 and 12:24 on the 11th December 2025.

During each monitoring campaign, the submitted reports state that the estimated mass of composting material on site was 6,000 tonnes.

Meteorological conditions including mean wind speed, direction, temperature and relative humidity were recorded during sampling to ensure sampling locations met the criteria of TGN M9 with respect to the position of the bioaerosol source(s) as far as practicable.

Transport, analysis and quantification of bioaerosols in the three submitted reports met the requirements of TGN M9

Site activities during sampling were recorded and reported in Section 4 of the submitted reports. While composting activities were being carried out during sampling on 29th November 2024, no activities likely to result in the highest airborne bioaerosol concentrations, i.e. turning, shredding and screening etc., coincided with the sampling periods during monitoring on the 24th October 2024 and 11th December 2025.

A reduced sampling frequency for bioaerosols was agreed with the operator based on the assumption that the site continues to adhere to current operational procedures designed to minimise exposure at offsite receptors as a result of site operations. The reduced monitoring frequency was also contingent upon monitoring being carried out during typical operational activities likely to generate airborne bioaerosols and at times representative of any seasonal variation in bioaerosol production which also captures periods where materials on site are at or as near to maximum capacity as normal operations allow.

From the supplied reports, it is evident that monitoring has not been carried out during periods that meet the above criteria and as such are unlikely to capture the maximum risk posed by bioaerosols generated by the Open Window Composting (OCW) operations at nearby receptors.

All three sampling campaigns occurred during colder periods with reduced volumes of material and in two cases were undertaken during periods when no composting activities likely to generate airborne bioaerosols were being carried out on site.

While Section 4 of the submitted reports for the 24th October 2024 and 11th December 2025 monitoring include rationales for not undertaking sampling at earlier periods of the respective years, including summer periods where both green waste volumes and bioaerosol formation are likely to be higher, the subsequent sampling does not meet the agreed criteria for sampling at reduced frequencies relative to the permit requirements.

While reported results indicate that bioaerosols at receptors are unlikely to exceed acceptable levels for mesophilic bacteria and *A.fumigatus*, the submitted sampling is insufficient to determine the maximum risk posed by composting operations when seasonal variation is taken into consideration which would likely have an effect on both the rate of bioaerosol formation and the volume of material processed on site.

While meteorological and site operational conditions can often present difficulties when coordinating a sampling campaign, it remains the responsibility of the operator to ensure that monitoring is carried out at the appropriate frequencies and under the agreed conditions (or as indicated in their permit) in order to meet the conditions of their site

permit. The operator has failed to meet these conditions for the 2024 and 2025 monitoring periods.

Given the deviation from requirements for these monitoring periods, you must carry out sampling in accordance with the requirements of your operating permit schedule over a period of twelve months in order to ensure that the OWC and associated activities continue to pose a low risk at receptors by sampling during typical operational activities likely to generate airborne bioaerosols and at times representative of any seasonal variation in bioaerosol production which also captures periods where materials on site are at or as near to maximum capacity as normal operations allow.

Action: You must return to undertaking bioaerosol monitoring in accordance with the requirements of the permit (Table S4.1, see below). Should you wish to agree to alternative monitoring periods we will assess this request following the submission of 12 months of bioaerosol monitoring. Please submit this request in writing, and NRW will review it.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Bioaerosol monitoring as required by condition 3.7.1(c)	In accordance with M9 – Technical Guidance Note.	Every 4 months or as agreed in writing by Natural Resources Wales	1 January, 1 May, 1 September

Please ensure all monitoring is representative of typical and higher-risk operational conditions, including periods of increased activity and seasonal variation, and must be carried out during composting activities likely to generate airborne bioaerosols and when materials on site are at or near maximum operational capacity. Please ensure that monitoring is conducted 3 times in 2026 to remain compliant with your permit.

Bioaerosol monitoring results submission dates - Action only

Action: Bioaerosol monitoring period 1st January – 30th April 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).

Action: Bioaerosol monitoring period 1st May – 31st August 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).

Action: Bioaerosol monitoring period 1st September – 31st December 2026, please submit monitoring results within the timescales specified in the permit (Within 28 days of the end of the reporting period).

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.