

## Compliance Assessment Report CAR\_NRW0052403

**Permit being assessed:** CB3398ZF.

**For:** Forward Waste Management East Moors Road Hazardous Waste Transfer Station,  
**held by:** Forward Waste Management Ltd

**At:** 122-128 East Moors Road, Cardiff, CF24 5EE.

**Type of assessment:** Audit,

**Reason:** Routine.

**On:** 16/07/2026.

**Parts of permit assessed:** 2.3.2.

**NRW Lead Officer:** Dale Padfield.

**Report sent to:** ~, SHEQ Manager, on 16/07/2026.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|-----------------------------------------------------------|-------------------|------------------|
| IR2C - Installations - Operations - Operating techniques  | Action only (X)   |                  |

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?

| Criteria | Action needed                                                                                       | Complete by |
|----------|-----------------------------------------------------------------------------------------------------|-------------|
| IR2C     | Action 1: Forward Waste 16th July 2026: Provide a response to Questions 1, 2, 3 and requests 1 & 2. | 31/08/2026  |

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.

**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

### Forward Waste Limited

#### EPR/CB3398ZF

The following CAR form provides an overview of the desktop audit of several wastes accepted by the facility during Q1 of 2026.

The following action was issued in the CAR\_NRW0052230

*‘Action 1: Forward Waste Limited 01/07/2026: With regards to the wastes accepted during this quarter, please provide the waste consignment / transfer notes for the following wastes along with the supporting evidence of their classification. Due 15<sup>th</sup> July 2026.*

*12 01 17 ~ Grit Blast wastes from the Rhondda Cynon Taf Local Authority area*

*16 03 04 ~ Titanium sludge*

*16 03 04 ~ Talc Waste*

*16 10 02 ~ Rusty Salt Water’*

### Review of Titanium sludge ~ EWC code 16 03 04

The waste is described as ‘inorganic waste with no materials above the hazardous thresholds’ with the consignment not describing the waste as titanium sludge and water from the manufacturing of Finetubes. It is understood the facility generating the waste undertakes a mix of physical and chemical treatment of metals (pipes and tubes).

The analysis highlighted the following key constituents:

- Titanium: 100,900 ppm (10.09%)
- Silicon: 127,381 ppm (12.74%)
- Aluminium: 26,703 ppm (2.67%)
- Nickel: 3,959 ppm (0.396%)
- Vanadium: 2,852 ppm (0.285%)
- Chromium: 1,861 ppm (0.186%)
- Sulphur: 6,162 ppm (0.616%)

- Water: 71.05%

The analysis does not provide indication on the nature of compounds such as salts, oxides or hydroxides, however it could be seen as a reasonable conclusion that the elements are in metallic form / metallic alloy particles if the waste has originated from a physical milling process and no chemical dissolution has taken place i.e., the waste sludge has not come from or been mixed with pickling acids, acid etch bath wastes, spent treatment liquors or precipitated dissolved metals etc. The analysis does support the conclusion that the metals, such as nickel are in metallic form within alloy particles or associated with oxide films on the metal fines. Under these circumstances the concentrations screen out as non-hazardous which supports the classification assigned.

It is noted that there is no supporting evidence to rule out the inclusion of oils, oils often used within mechanical milling and cutting and often end up within the waste water / from these processes.

**Question 1:** Has any assessment or consideration been given to the potential for organic or oil contamination within this waste stream? Carbon based products are largely invisible to the XRF analytical technique, is there any potential for organic compounds (oils, coolants, greases, surfactants, biocides, glycol etc to be present in this waste stream, has the waste producer confirmed the absence of these within the processes generating the waste?

A further observation is the assigned EWC code, the application of EWC codes needs to follow a systematic approach as defined by the hierarchy set out in WM£ Appendix A. It is a requirement to firstly identify if the waste can assigned a code under a specific industry process, listed in chapters 01 to 12 and 17 to 20, if the waste cannot be assigned a code under these chapters then chapters 13, 14 and 15 should be reviewed. If no entry can be found that matches the waste, then chapter 16 codes may be used.

The waste has been assigned EWC 16 03 04 ~ inorganic wastes other than those mentioned in 16 03 03. A more appropriate EWC code would be a chapter 12 EWC code ~ Wastes from the shaping and physical and mechanical treatment of metals and plastics, specifically 12 01 15 or 12 01 14.

**Question 2:** Is there a reason this code has not been applied? Why was the wastes assigned the Chapter 16 code before the chapter 12 code was considered?

### **Review of grit blast waste ~ EWC 12 01 17**

The waste is described as “waste blasting material used of metal parts with no material above the hazardous thresholds according to WM3 appendix C”.

The waste consignment notes identify this waste stream as arising from the aerospace sector and describe the waste as “Alumium Oxide Shot Blast 100%”

The sample was analysed by XRF and the principal reported constituents were:

- Sodium (Na): 2.71%
- Barium (Ba): 0.58%
- Titanium (Ti): 0.357%
- Calcium (Ca): 0.196%
- Sulphur (S): 0.149%
- Zinc (Zn): 0.098%
- Aluminium (Al): 0.079%
- Vanadium (V): 0.050%
- Silicon (Si): 0.049%

The analytical data provided does not appear to fully support the waste description of spent aluminium oxide shot blast media. Aluminium was reported at only 0.0791%, whereas aluminium would be expected to be a major constituent if the waste consisted predominantly of aluminium oxide blasting media. The analysis also only accounts for approximately 4.3% of the total sample mass, leaving around 95.7% of the material uncharacterised.

No elevated concentrations of typical hazardous metals of concern were identified. Chromium, cadmium, lead, mercury and arsenic were not detected, while nickel, vanadium and zinc were present only at relatively low concentrations. The Barium was described as being present as barium-sulphate, which is plausible as it is commonly used in the aerospace sector. On the basis of the reported metals, there is no obvious indication that the waste would be classified as hazardous under WM3.

However, the analysis is limited to inorganic elemental constituents and provides no information on:

- the nature of the uncharacterised bulk material;
- moisture content;
- organic contaminants such as oils, greases or process fluids;
- coatings or surface treatments removed during blasting; or
- hazardous substances potentially associated with the blasted substrate rather than the blasting media itself.

Given the apparent discrepancy between the waste description and the analytical results, further justification is required to demonstrate that the analysis is representative of the waste stream and that all potentially hazardous constituents have been adequately considered within the WM3 assessment.

**Request 1:** Provide the following information, the blasting media used, the material/coating being blasted, and how the remaining uncharacterised fraction of the waste has been assessed.

**Request 2:** A further observation is the analysis was dated the 1<sup>st</sup> of July 2026, this was the date the initial request for the information was sent, the waste in question pre dates the analysis, provide copies of any previous analytical results for this waste stream.

### **Review of 'Rusty Salt Water Waste EWC code 16 10 02**

Waste described as Rusty Salt Water from the manufacture of parts and accessories for motor vehicles, with a further description stating the waste is a salt water that has been used for rinsing steel components.

The waste appears to be an aqueous chloride-rich solution contaminated with iron corrosion products arising from the cleaning or flushing of metallic components. The analysis supports the producer description of 'rusty salt water from cleaning parts'. The assigned EWC 16 10 02 is plausible, subject to confirmation that no hazardous organic contaminants or dangerous substances are present at concentrations triggering hazardous properties. As with the above, the XRF analysis does not detect potential oil, hydrocarbons, surfactants/detergents or VOC's or pH.

**Question 3:** Has the supplier of the waste confirmed the absence of the above mentioned contaminants, is there analysis or evidence to support this?

### **Review of Talc Powder waste ~ EWC code 16 03 04**

This waste is described as off specification waste of inorganic origin. The safety data sheet confirm the product as Talc, with no associated hazards. The consignment note describes the waste as 'Talc Waste ~ Extraction of through LEV'.

The origin of the waste suggests this is waste arising from an LEV collection system, if the only product / substances handled in the system producing this waste is the Talc, then the MSDS is sufficient to classify the waste as non-hazardous.

The nature of the business generating waste, provided by companies house, describes the business as the 'Manufacture of paints, varnishes and similar coatings, mastics and sealants'.

Following the hierarchy of the LoW, a more appropriate EWC code may be found in chapter 8, such as 08 02 01.

**Action 1: Forward Waste 16<sup>th</sup> July 2026:** Provide a response to Questions 1, 2, 3 and requests 1 & 2. Due 31/08/2026.

**End.**

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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.