

Compliance Assessment Report CAR_NRW0052540

Permit being assessed: MB3190HG.

For: A D Plant, **held by:** Edith Patricia Parry Ltd

At: Warren, Rhos-Y-Meirch, Knighton, Knighton, Powys, LD7 1PE.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 30/07/2026.

Parts of permit assessed: Emissions to Air.

NRW Lead Officer: Malcolm Dines.

Report sent to: Howard Morgan, Director, on 30/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)
W3A(2) - Waste - Emissions and monitoring - Emissions to air	C3 Minor	d
W1A - Waste - Management - General management	C3 Minor	1.1.1(a)

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

Total non-compliances recorded	Total non-compliance score
3	12

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
W1A	Submit the records of the three non-compliances relating to the breach of emission limit values for VOCs on 4 February 2026, as recorded on Compliance Report CAR_NRW0051683, and the measures taken by the company to ensure compliance is restored in the shortest possible time	30/09/2026

Criteria	Action needed	Complete by
W3A(2)	Review the company's current air quality risk assessment using site specific emissions data to determine the Process Contribution. The review should use the Process Contribution in conjunction with the background concentration to determine the Predicted Environmental Concentration and determine whether the non-compliance has resulted in either a short term or long term breach of air quality standards for protecting human health and ecosystems	30/09/2026
W1A	Re-test the stack emission monitoring as set out in Table 3.1 of the permit	30/09/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

This was a routine review of data carried out by Malcolm Dines (Waste Regulation Officer) following the deadline for submitting an Investigation into the breach of Emission Limit Values for VOCs, during the stack emission monitoring on 4 February 2026.

Permit Breaches

W1A - General Management - Category 3; Permit Rule 1.1.1(a)

The company has been given this Category 3 breach of the above Rule as it has failed to comply with the following actions required by Compliance Report CAR_NRW0051683, dated 06/05/2026:

- Submit a report investigating the breach of Emission Limit Value for VOCs during the stack emission monitoring on 4 February 2026
- Submit a report of the review the company's current air quality risk assessment using site specific emissions data to determine the Process Contribution and which also determine whether the breach of emission limit for VOCs has resulted in either a short term or long term breach of air quality standards for protecting human health and ecosystems
- Failed to produce an action plan detailing how the company intends to rectify the

non-compliance

The failure to comply with the actions required by a compliance report is a failure to operate in accordance with an adequate Management System. The Management System for the site must have a process for how the company will record non-compliances and ensure compliance is restored in the shortest possible time.

Action: Submit the records of the three non-compliances relating to the breach of emission limit values for VOCs on 4 February 2026, as recorded on Compliance Report CAR_NRW0051683, and the measures taken by the company to ensure compliance is restored in the shortest possible time **by 30 September 2026**

W3A(2) - Emission to Air - Category 3; Permit Rule 3.1.2

The Company has been given this Category 3 breach of rule 3.1.2 because it has failed to investigate and identify the impact of the breach of emission limit value for VOCs on 4 February 2026. The measured concentration of VOCs during the sampling was reported as 1771 mg/m³. The Measurement of Uncertainty for VOCs is 40% of the the measured concentration, meaning the assessed concentration is 1062.6 mg/m³, exceeding the Emission Limit value of 1000mg/m³.

The company was given an Action Only breach for this non-compliance on Compliance Report CAR_NRW0051683, dated 06/05/2026 and was required to investigate and submit a report into the breach of emission limit. The company was also required to review the company's current air quality risk assessment to determine whether the non-compliance has resulted in either a short term or long term breach of air quality standards for protecting human health and ecosystems. the company failed to comply with both these actions.

Action: Review the company's current air quality risk assessment using site specific emissions data to determine the Process Contribution. The review should use the Process Contribution in conjunction with the background concentration to determine the Predicted Environmental Concentration and determine whether the non-compliance has resulted in either a short term or long term breach of air quality standards for protecting human health and ecosystems **by 30 September 2026**

W1A - General Management - Category 3; Permit Rule 1.1.1(a)

The company has been given this Category 3 breach of the above Rule as it has failed to produce an action plan detailing how the company intends to rectify the non-compliance of the the breach of Emission Limit Value for VOCs on 4 February 2026, as required by Compliance Report CAR_NRW0051683, dated 06/05/2026.

Because the company has failed to identify why the emission limit for VOCs was breached and what it will do to prevent it recurring, further stack emission monitoring must be undertaken to demonstrate compliance with the permit.

Action: Re-test the stack emission monitoring as set out in Table 3.1 of the permit **by 30 September 2026**

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales

established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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.