Compliance Assessment Report CAR_NRW0052868

Permit being assessed: AB3695CH.

For: Nine Mile Point Waste Transfer Facility, **held by:** Drumcastle Limited

At: Unit 9, Nine Mile Point Industrial Estate, Cwmfelinfach, Ynysddu, Newport, Caerphilly, NP11 7HZ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 04/09/2026.

Parts of permit assessed: See comments section.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, General Manager, Plant Manager, on 04/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3E - Installations - 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
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
IR4B	The operator shall report 6-monthly emissions monitoring results for TVOC, dust and odour concentration to NRW as required by the environmental permit.	28/01/2027
IR3E	The operator shall undertake measures to ensure that future monitoring of emissions to air is carried out at the frequency	Already completed

Criteria	Action needed	Complete by
	specified in Table S3.1 of the environmental permit.	

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

ASSESSMENT SUMMARY

(1) The operator did not undertake or report emissions-to-air monitoring (TVOC, dust and odour concentration) during the period January to June 2026, resulting in non-compliance with permit conditions relating to monitoring, reporting and notification. However, NRW acknowledges that this non-compliance resulted from a communication misunderstanding regarding the agreed monitoring arrangements. No CCS score will be applied on this occasion.
(2) The operator has confirmed that emissions-to-air monitoring will be undertaken in August 2026 and the results submitted to NRW.
(3) Monitoring and reporting requirements for emissions to water were complied with and no breaches of permit conditions relating to water emissions were identified.

ASSESSMENT DETAILS

This Compliance Assessment Report (CAR) is a record of Natural Resources Wales' (NRW) assessment of Drumcastle Limited's (the operator) emissions to air and water reporting forms for the period January to June 2026 against the relevant environmental permit conditions for reporting, emissions & monitoring and notifications.

Document submitted by the operator

Reference – *Water-SW1 monthly monitoring visual check.docx* (submission date – 20 July 2026)

Assessment Structure

COMPLIANCE CRITERIA (e.g., IR4B, IR3A(1), IR3E)
(a) Permit Condition
(b) Compliance Assessment
(c) Consolidation of Non-Compliance Score
(d) Root Cause Analysis (when applicable)

IR4B – INFORMATION – REPORTING

(a) Permit Condition

Environmental permit condition 4.2.3 states:

> *Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:*
>
> *(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
>
> *(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in*

schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

Table S4.1 of Schedule 4 to the environmental permit has been amended and is reproduced below. The reporting period for emissions to air have been amended to 6-monthly to mirror the 6-monthly monitoring requirement. The reporting period for emissions to water remains 3-monthly. See CAR_NRW0050315 for further details.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
Emissions to air Parameters as required by condition 3.5.1	A1	Every 6 months	1 January
Emissions to water Parameters as required by condition 3.5.1	SW1	Every 3 months	1 January

Note: Following submission and approval of reports to satisfy pre-operational conditions PO2 and PO11, and as detailed in compliance assessment report ref: CAR_NRW0040481, Table S3.3: *Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements*, will not be enforced at this time. As no monitoring of the emission to sewer is required, no reporting is necessary.

Table S4.4 of Schedule 4 to the environmental permit has been updated and is partially reproduced below. See CAR_NRW0050315 for further details.

Table S4.4 Reporting forms		
Parameter	***Reporting format***	***Date of form***
Air	*Form air 1 or other form as agreed in writing by Natural Resources Wales*	*09/01/2026*
Water	*Form water 1 or other form as agreed in writing by Natural Resources Wales*	*09/01/2026*

(b) Compliance Assessment

Point Source Emissions to Air – A1

The operator did not submit monitoring results for emissions to air for the reporting period January to June 2026, which represents non-compliance with the reporting requirements of the environmental permit. See compliance criteria IR3E – EMISSIONS AND MONITORING – MONITORING for details.

***Compliance Classification Scheme (CCS)**: No CCS score will be levied for this non-compliance with permit condition 4.2.3.*

***Justification**: The failure to report emissions to air resulted from a communication misunderstanding between the operator and NRW regarding the monitoring schedule.*

***Action**: The operator shall report 6-monthly emissions monitoring results for TVOC, dust and odour concentration to NRW as required by the environmental permit.*

Point Source Emissions to Water – SW1

(1) The operator submitted monitoring results for emissions to water by email on 20 July 2026 (reference: *Water-SW1 monthly monitoring visual check.docx*). This is within the 28 day reporting window, demonstrating compliance with the reporting requirements of the environmental permit.

(2) The operator submitted monitoring results using the *water 1* reporting form specified in Table S4.4 of

Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.
(3) The operator submitted monitoring results for the reporting period specified in Table S4.1 of Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.
(4) The operator submitted monitoring results for all the parameters and emission points specified in Table S4.1 of Schedule 4, demonstrating compliance with the reporting requirements of the environmental permit.

***Compliance Classification Scheme (CCS)**: There are no incidents of non-compliance with permit condition 4.2.3.*

***Justification**: NA*

***Action**: no action required*

(c) Consolidation of Non-Compliance Scores
Consolidation of CCS scores is not required

(d) Root Cause Analysis
NA

IR3A(1) – EMISSIONS AND MONITORING – EMISSIONS TO WATER
(a) Permit Condition
Environmental permit condition 3.1.2 states:

The limits given in schedule 3 shall not be exceeded.

Table S3.2 of Schedule 3 to the environmental permit is reproduced below.

Table S3.2 Point source emissions to water – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
SW1	Site drainage from building roofs and areas not associated with waste storage and treatment	Oil and grease	None visible	Periodic	Monthly	Visual check

(b) Compliance Assessment
Point Source Emissions to Water – SW1
The monitoring results for emissions to water were within the emission limits specified in Table S3.2 of Schedule 3, demonstrating compliance with the monitoring requirements of the environmental permit

***Compliance Classification Scheme (CCS)**: There are no incidents of non-compliance with permit condition 3.1.2.*

***Justification**: NA*

***Action**: no action required*

(c) Consolidation of Non-Compliance Scores
Consolidation of CCS scores is not required

(d) Root Cause Analysis
NA

IR3E – EMISSIONS AND MONITORING – MONITORING

(a) Permit Condition

Environmental permit condition 3.5.1 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) point source emissions specified in tables S3.1, S3.2 and S3.3.*

(b) Compliance Assessment

Point Source Emissions to Air – A1

The operator did not undertake monitoring of emissions to air for the reporting period January to June 2026, which represents non-compliance with the monitoring requirements of the environmental permit.

NRW acknowledges that this non-compliance was caused by a communication misunderstanding between the operator and NRW regarding monitoring arrangements. The operator has confirmed that monitoring of TVOC, dust and odour concentration will be undertaken in August 2026.

The operator is reminded that they are responsible for ensuring that emissions monitoring is undertaken in accordance with the requirements of the environmental permit. Any future failure to undertake the required monitoring will result in Compliance Classification Scheme (CCS) scores being applied.

> ***Compliance Classification Scheme (CCS)****: No* CCS score will be levied for this non-compliance with permit condition 3.1.2.
>
> ***Justification****: The failure to monitor emissions to air resulted from a communication misunderstanding between the operator and NRW regarding the monitoring schedule.*
>
> ***Action****: The operator shall undertake measures to ensure that future monitoring of emissions to air is carried out at the frequency specified in Table S3.1 of the environmental permit.*

(c) Consolidation of Non-Compliance Scores

Consolidation of CCS scores is not required

(d) Root Cause Analysis

NA

[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.