Compliance Assessment Report CAR_NRW0052890

Permit being assessed: KP3636HB.

For: The Recycling Centre EPR/KP3636HB, **held by:** Egan Waste Services Limited

At: Egan Waste Services Recycling Centre Unit A15 Treforest Industrial Estate , Pontypridd, CF37 5TA.

Type of assessment: Site Inspection,

Reason: Routine.

On: 19/08/2026 between 10:00 and 12:00.

Parts of permit assessed: 2.1.1, 3.2.3, 3.7.1, 2.3.1(a), .

NRW Lead Officer: Dale Padfield, accompanied by Greg Gardner.

Report sent to: ~, Dangerous Goods Safety Advisor (DGSA, on 08/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C2 Significant	3.2.3
IR3I - Installations - Emissions and monitoring - Fire	C2 Significant	3.7.1
IR2C - Installations - Operations - Operating techniques	C2 Significant	2.3.1(a)
IR2D - Installations - Operations - Technical requirements	C3 Minor	2.3.3
IR1A - Installations - Management - General Management	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
4	97

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
IR3B	Action 2 ~ Egan Waste ~ 08th of September 2026 ~ Compliance improvement plan: See main body of report for action details.	01/10/2026
IR3I	Action 2 ~ Egan Waste ~ 08th of September 2026 ~ Compliance improvement plan: See main body of report for action details.	01/10/2026
IR2C	Action 2 ~ Egan Waste ~ 08th of September 2026 ~ Compliance improvement plan: See main body of report for action details.	01/10/2026
IR2D	Action 1: Egan Waste Limited ~ 7th of September 2026 ~ Management System Evidence Review ~ Refer to main body of report for action details.	31/10/2026
IR1A	Action 1: Egan Waste Limited ~ 7th of September 2026 ~ Management System Evidence Review ~ Refer to main body of report for action details.	31/10/2026

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

Egan Waste Services Ltd

EPR/KP3636HB

This Compliance Assessment Report (CAR) details observations made during a site inspection undertaken on 14 July 2026 and a subsequent follow-up visit on 19 August 2026.

The inspection focused on waste acceptance and storage activities, hazardous waste management, pollution prevention infrastructure, housekeeping standards and general permit compliance requirements. A number of significant non-compliances were identified across the site, several of which are repeat issues previously raised with the operator.

The observations indicate deficiencies in waste classification, hazardous waste segregation, secondary containment provision, spill management, housekeeping standards and implementation of the site's Environmental Management System (EMS). Whilst no significant pollution incident was observed during the inspection, nor are NRW currently aware of any such incidents, the conditions present

substantially increase the likelihood and potential consequence of a future environmental incident affecting land, groundwater and surface waters.

The number and severity of the issues identified suggest that operational controls and management oversight are not being implemented to the standard required by the permit.

Unauthorised External Storage of Hazardous Waste

Hazardous wastes were observed being stored externally in areas not authorised for such storage, contrary to Permit Condition 2.1.1, which requires all hazardous waste to be stored within a building. Furthermore, hazardous waste containers located adjacent to the eastern side of the tank farm had not been provided with suitable secondary containment, contrary to Permit Condition 3.2.3.

The area was considered particularly unsuitable for hazardous waste storage due to:

- Poor condition of the hardstanding surface with visible cracks within exposed areas of flooring.
- Storage adjacent to unmade ground.
- Poor stacking arrangements with damaged and broken pallets.
- A lack of effective containment infrastructure.

These conditions significantly increase the risk of environmental pollution.

In the event of a spill, leak or container failure, pollutants could readily migrate into surrounding soils and potentially impact groundwater or surface water receptors. The absence of secondary containment removes an important pollution prevention barrier and substantially increases the potential consequences of any loss of containment.

The current storage arrangements increase the potential risk of:

- Pollution of land.
- Groundwater contamination.
- Surface water contamination.
- Migration of pollutants beyond site boundaries.
- Escalation of fire incidents.
- Uncontrolled releases following container failure.
- Chemical incompatibility incidents.

The storage and treatment of wastes external to a building was scored in CAR_NRW0050884. The hazardous waste being stored externally was not identified during the initial breach of this permit condition, however the score in CAR_NRW0050884 should also be seen as applying to the hazardous

waste storage breach identified during the site visit on the 14th of July. During the follow-up visit undertaken on the 19th of August 2026, the vast majority of the hazardous waste had been relocated to appropriate storage locations, including the drum store, flammables store and other dedicated storage locations. The non-hazardous waste pile was seen to be significantly reduced, with work being undertaken to remove the pile in its entirety. The operator stated that the plan was to move the storage and operation into the large building housing the trommel, with the initial steps being undertaken, including removing the current pile and determining a suitable means to undertake the operation within a building going forward.

This aspect was not yet fully compliant with the permit, and the site is deemed to still be in breach of permit condition 2.1.1. However, a non-compliance score has already been levied against permit condition 2.1.1 and this is deemed to appropriate cover the incorrect storage of hazardous waste identified during the site visit. As such, no additional non-compliance score will be issued at this time. However, should the same issue be identified during any subsequent visits, further non-compliance scoring will be issued along with consideration for further enforcement action.

The absence of secondary containment for hazardous aqueous wastes constitutes a newly identified non-compliance. Hazardous waste must be stored and treated within a building on an impermeable surface with sealed drainage. Permit condition 3.2.3 requires containers holding liquids capable of causing pollution to be provided with secondary containment unless other appropriate measures have been implemented to prevent, or where not practicable minimise, leakage and spillage from the primary container. During the inspection, no alternative containment or pollution prevention measures were identified that would provide an equivalent level of protection. The hazardous aqueous wastes were stored externally on damaged pallets, on cracked hardstanding adjacent to unmade ground, with no impermeable containment system, drip trays, spill pallets, contained storage area, sealed drainage arrangements or other engineered controls capable of preventing or minimising releases to land or water in the event of a leak, spill or container failure. Accordingly, the exemption within condition 3.2.3 is not considered to apply and the operator was non-compliant with this permit requirement.

Given the hazardous nature of the liquid wastes, the absence of secondary containment, the poor condition of the hardstanding surface and the proximity of unmade ground, NRW considers it reasonably foreseeable that a significant leak, spill or container failure could result in hazardous substances entering the ground and subsequently being detected above background concentrations in groundwater. The foreseeable consequence is therefore not limited to localised housekeeping issues or minor contamination, but includes the potential for significant pollution of land and groundwater receptors.

NRW has assessed this non-compliance as Category 2 because the absence of secondary containment removes a key engineered pollution prevention barrier for hazardous liquid wastes. Whilst no actual pollution was identified during the inspection, the reasonably foreseeable consequence of a container failure, leak or spill would be a significant pollution event affecting land and potentially groundwater. Given the hazardous nature and volume of wastes present, the lack of alternative containment measures, the defective storage surface and the direct pathway to ground, the foreseeable environmental impact is considered significant rather than minor.

Non-compliance: A Category 2 non-compliance is issued for failing to provide secondary containment for hazardous aqueous wastes. **Permit Condition 3.2.3**.

During the follow-up inspection on 19/08/2026, Egan Waste had relocated all hazardous waste previously stored adjacent to the tank farm. This represented a significant improvement and reduced the immediate risk associated with the storage of hazardous wastes in this area. However, hazardous containers holding hazardous liquid wastes were still observed being stored without secondary containment. Permit condition 3.2.3 applies to all liquids whose release could cause pollution, regardless of whether they are stored indoors or outdoors, unless alternative appropriate measures are in place to prevent or minimise leakage and spillage.

Egan Waste is reminded that all liquids whose release could result in environmental pollution must be provided with appropriate secondary containment or other suitable measures to prevent their release to the environment.

During the inspection on 19/08/2026, a number of unused pallet bunds suitable for providing secondary containment were observed stored on site but were not being used beneath containers of hazardous liquid waste. The availability of appropriate containment equipment on site indicates that reasonably practicable measures were available to the operator but had not been implemented. The fact that the site possesses suitable containment equipment but has failed to utilise it raises further concerns regarding the management of the facility, the effectiveness of operational controls, and the implementation of procedures within the Environmental Management System (EMS). This suggests that either site procedures are not being adequately communicated to operational staff or that established procedures are not being consistently followed in practice.

NRW will investigate whether the non-compliance is attributable to failures of the site's Environmental Management System and whether further breaches of Permit Conditions 1.1.1(a) and/or 1.1.1(b) have occurred. Information to support this investigation is requested in Action 1 (**Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review)** details of which can be found further in this report.

Fire Prevention and Mitigation Plan (FPMP)

The site is failing to operate in accordance with the accepted FPMP. The following observations are made;

Section 2.1 – Batteries stored within buildings without 6 meter gap separation for combustibles, contrary to the FPMP.

Section 2.8 – states the site is cleaned daily to remove loose combustible materials and dusts – evident from the inspection that very little house-keeping had taken place for an extended period.

Section 2.18 states that;

"Waste streams delivered to Egan Waste are predominately non-hazardous, and upon receipt at site the waste is inspected and then sorted into their different waste streams immediately.

All Hazardous Waste including Oily / Chemical-soaked rags and liquids are immediately identified upon arrival, they are then sorted, transferred into designated receptacles and segregated by classification. These are stored in a secure steel cladded building ready for onward transfer."

Site observations indicate that hazardous wastes were not consistently segregated and stored in the manner described within the FPMP

Section 2.19 states that;

"A designated storage area is maintained on site for flammable materials including fuel and oil storage. The fuel storage is located on the northern boundary of the site, approximately 20 metres away from the recycling building. Fuel storage consists of two integrally bunded steel diesel tank with a capacity of 2,500 litres, and 1,500 litres respectively. The oil store is also located on the northern boundary of the site, approximately 25 metres away from the recycling building. Oil storage is contained within 4 tanks, all substances stored in compliance with the Oil Storage regulations."

Wastes designated as flammable were identified as being stored within the recycling building alongside other hazardous wastes exhibiting a range of hazardous properties. Mixed hazardous wastes were also observed stored within red bin sacks from a single customer, including containers labelled as flammable. The FPMP indicates that only WEEE and cardboard bales are stored within this building. This presents a significant risk to Fire and Rescue Service personnel, as additional hazardous materials are being stored within the building that are not identified within the FPMP.

The presence of flammable and mixed hazardous wastes within the building also increases the environmental risk. In the event of a fire, there is potential for the release of hazardous combustion products, contaminated firewater and pollutant-containing run-off. These contaminants could migrate beyond the site boundary, resulting in pollution of surface waters, groundwater, soils and drainage systems. Furthermore, the presence of hazardous wastes not accounted for within the FPMP may affect the effectiveness of fire response measures and increase the likelihood and severity of environmental impacts arising from a fire incident.

Section 2.21 states;

"As previously documented suitably trained site operatives carry out daily checks of the site to identify any risks and inspect the storage bays, any stockpiles, bale storage areas and skips."

The condition of the site raises concerns regarding the effectiveness of the daily inspection regime described within the FPMP.

The above findings demonstrate a significant non-compliance with Permit Condition 3.7.1. Egan Waste has failed to operate the facility in accordance with the Fire Prevention and Mitigation Plan (FPMP), resulting in an increased likelihood of a fire occurring and an increase in the potential severity of any fire incident.

Firewater generated during a fire is likely to become heavily contaminated by the various hazardous wastes stored within the building. Given the poor condition of the site surfacing, it is unlikely that contaminated firewater would be fully contained, creating a significant risk of pollution to land, groundwater and surface water receptors. Furthermore, the storage of hazardous wastes not identified within the FPMP may impede effective fire-fighting operations and increase the volume and toxicity of contaminated firewater generated during an incident. They also create uncertainty for emergency responders who may rely on the FPMP when responding to an incident.

There is also a foreseeable risk to air quality arising from the combustion of hazardous waste materials. A fire involving these wastes could result in the release of toxic and potentially harmful smoke, fumes and combustion by-products, which may adversely affect human health and the environment both on and beyond the site boundary.

The Fire Prevention and Mitigation Plan is incorporated into the permit through Schedule 1 Table S1.2 and compliance with that plan is required by Condition 2.3.1(a). The failures identified during the inspection therefore indicate non-compliance with both Condition 3.7.1 and Condition 2.3.1(a). However, to avoid duplication, NRW has recorded the non-compliance against Condition 3.7.1, which specifically requires the site to be operated in accordance with the FPMP. The following non-compliance will be issued.

Non-compliance: **A Category 2 non-compliance** is issued for failing to operate in accordance with the site Fire Prevention and Mitigation Plan. **Permit Condition 3.7.1.**

The inspection findings indicate that the breach of Permit Condition 3.7.1 is likely to be symptomatic of wider management system failings. The site was not being operated in accordance with several key requirements of the Fire Prevention and Mitigation Plan, including waste segregation, housekeeping standards, storage arrangements and fire prevention measures. These failures raise concerns regarding the effectiveness of site management controls, staff supervision, competence and daily inspection arrangements.

NRW will investigate whether the non-compliance is attributable to failures of the site's Environmental Management System and whether further breaches of Permit Conditions 1.1.1(a) and/or 1.1.1(b) have occurred. Information to support this investigation is requested in Action 1 (**Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review)** details of which can be found further in this report.

Segregation and Storage of Hazardous Wastes

Multiple hazardous waste streams with potentially incompatible chemical properties were observed being stored in close proximity throughout the site. This included flammables near oxidising and toxic substances, and acids and alkalis stored together.

The inspection found little evidence that compatibility assessments had been undertaken, documented or implemented. Hazardous wastes appeared to be grouped according to available space rather than hazard classification, with limited evidence that the risks associated with mixing incompatible substances had been considered through the site's Environmental Management System.

The absence of clear compatibility assessments, together with the storage arrangements observed, raises concerns regarding the effectiveness of operational controls, management oversight, staff awareness and implementation of site procedures for hazardous waste management. NRW will seek further information to determine whether suitable procedures existed, whether staff had been trained in those procedures, whether inspections and audits were being undertaken, and whether sufficient competent persons and resources were available to ensure hazardous wastes were appropriately segregated and managed.

The current arrangements create an increased risk of:

- Fire initiation.
- Fire escalation.
- Chemical incompatibility incidents.
- Violent reactions.
- Generation of hazardous vapours and gases.
- Pollution to land and waters.
- Risks to site personnel and emergency responders.

A comprehensive review of hazardous waste storage arrangements must therefore be undertaken and incompatible wastes segregated in accordance with their hazard properties and recognised compatibility requirements.

Appropriate segregation measures should include:

- Dedicated storage areas.
- Clear identification and signage.
- Physical separation distances.
- Suitable containment systems.
- Compatibility assessments.

- Defined storage procedures.

The observed failures indicate non-compliance with the permitted operating techniques referenced within table S1.2 of the permit. Within this table, a reference is made the application ~ *'Part B3 Table 3a- Technical Standards', this section of the application document references both 'How to comply with your environmental permit* and *'Sector Guidance note (SGN) S5.06'* which provides Guidance on BAT for the Recovery and Disposal of Hazardous and Non Hazardous Waste.

Section 2.1.3 of 2.1.3 of SGN 5.06 lists appropriate measures including segregated storage in line with HSE guidance HSG51, HSG71 and HSG716. Similarly, page 35 of 'How to comply with your environmental permit' also provides reference to correct segregation of incompatible wastes, ensuring correct separation distances for storage are employed.

Section 2.1.2 details appropriate measures for waste acceptance, including correct waste labelling with How to comply with your environmental permit also not the requirement for storage areas to have appropriate signs and notices and be clearly marked-out, with all containers and packages clearly labelled.

These failures represent a breach of permit condition 2.3.1(a).

During the follow-up inspection, it was evident that progress had been made in segregating hazardous wastes according to their hazard classifications. The various waste storage areas across the site were being utilised more appropriately, with wastes generally being stored in the designated areas for their respective classifications.

In addition, a significant improvement was noted in the labelling of waste containers. Labels were clearly displayed and provided a much clearer indication of the waste types being stored. Signage had also been updated in a number of areas to better reflect the wastes intended to be stored within those locations.

Whilst these improvements are welcomed, further work remains necessary to achieve full compliance. Although hazardous wastes were generally being stored in more appropriate locations and labelling had improved, NRW has not yet received sufficient evidence to demonstrate that compatibility assessments, storage procedures, inspection regimes and management controls have been fully implemented and are operating effectively.

In particular, NRW will seek further information regarding:

- Whether compatibility assessments have been undertaken for hazardous wastes stored on site;
- Whether documented procedures exist for the segregation and storage of hazardous wastes;
- Whether relevant staff have received training in those procedures;
- Whether routine inspections and internal audits are undertaken to verify compliance; and
- Whether sufficient competent persons, resources and management oversight are available to ensure permit requirements are consistently implemented.

This information will assist NRW in determining whether the non-compliance arose from an absence of suitable procedures, deficiencies in existing procedures, inadequate training, insufficient

supervision or oversight, ineffective auditing arrangements, or a failure to follow otherwise adequate management controls.

NRW will investigate whether the non-compliance is attributable to failures of the site's Environmental Management System and whether further breaches of Permit Conditions 1.1.1(a) and/or 1.1.1(b) have occurred. Information to support this investigation is requested in Action 1 (**Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review)** details of which can be found further in this report.

‘Recycling building’ and Hazardous Waste Storage

Several deficiencies were identified within the large storage building designated as the ‘recycling building’.

These included:

- Poor housekeeping standards throughout the building.
- Inadequate waste identification signage.
- No clear segregation of hazardous wastes according to hazard classification.
- No designated storage locations for specific hazardous waste streams.
- Waste stored in areas carrying incorrect signage.
- Historical spillages present on the floor.
- Absorbent granules applied to spillages but not subsequently removed.
- Poor condition of surfacing
- No secondary containment for aqueous wastes, with no tertiary containment or other appropriate measures in place.

The current storage arrangements do not demonstrate that hazardous wastes are being managed in a manner that minimises the risk of pollution or incompatible chemical interactions.

Poor segregation and identification of hazardous wastes increases the risk of:

- Incompatible materials being stored together.
- Chemical reactions occurring between waste streams.
- Fire initiation and fire escalation.
- Release of hazardous substances.
- Cross-contamination of waste streams.

- Incorrect handling by site personnel.
- Delays and complications during emergency response situations.
- Potential migration pathways for hazardous substances.

The poor housekeeping standards observed also indicate deficiencies in routine inspection, maintenance and spill management procedures. Unmanaged spillages may be spread by vehicle movements, site activities or firefighting water in the event of an incident, increasing the risk of environmental pollution. These deficiencies also **indicate non-compliance with Permit Condition 2.3.1(a).**

During the follow-up inspection on 19/08/2026, the non-compliances identified within this building remained largely unchanged. Whilst some progress had been made in segregating hazardous wastes by hazard classification, a number of waste streams continued to be stored in a manner inconsistent with the site's storage requirements and procedures.

The operator advised that an external chemist from an onward waste management facility had been engaged to assess, categorise and classify a substantial quantity of laboratory chemicals and laboratory smalls currently being stored on site. This work is intended to facilitate the correct segregation, packaging and subsequent removal of these wastes for appropriate recovery or disposal.

Whilst this proposed action is welcomed, the identified non-compliances remain unresolved until the wastes have been appropriately characterised, segregated and removed from the site. As such, the environmental and safety risks associated with the current storage arrangements remain present.

Small Storage Unit (Drum Store)

A number of concerns were identified within the storage unit used for drums and hazardous wastes.

These included:

- An open drum containing solvent waste.
- Significant pooling of oils and other liquids within the floor bund.
- Apparent yellow sharps containers stored within the area.
- Poor waste identification and segregation arrangements.
- Inconsistent hazard signage.
- Diesel stored in damaged IBC.

The presence of an open solvent container creates an unacceptable risk of:

- Volatile organic compound emissions.

- Fire and explosion.
- Accidental spills.

The accumulation of liquids within the bund significantly reduces available containment capacity and suggests that spill response and housekeeping arrangements are not being effectively implemented.

The presence of healthcare-type sharps containers raises concerns regarding waste acceptance procedures, if the bins were sharps bins containing sharps, this is not a permitted waste stream for acceptance on to site. The operator should review these wastes and demonstrate compliance with permit waste acceptance requirements.

In addition, flammable and toxic signage were observed indicating these waste types were to be stored immediately adjacent to one another. The storage area was empty at the time of the inspection. However, such arrangements increase the risk of fire, chemical interaction and complications during emergency response, correct segregation or separation should be employed on site, there is HSE guidance available (HSG71) to aid in ensuring correct storage arrangements are in place.

As identified above, these failing also represent a **failure to comply with Permit Condition 2.3.1(a).**

During the follow-up inspection on 19/08/2026, significant improvements were observed within the drum store. The liquid previously pooled within the bunded area had been removed, and the bund and surrounding storage areas had been cleaned to an acceptable standard. Housekeeping throughout the store was notably improved, with waste and materials stored in a more organised manner.

Appropriate labelling was present on the containers inspected, clearly identifying the contents of the wastes being stored. In addition, signage within the store had been reviewed and updated to accurately reflect the waste types and storage arrangements in place.

These improvements are welcomed and demonstrate that action has been taken to address several of the deficiencies identified during previous inspections. Continued effort will be required to ensure that these standards are maintained and that all remaining non-compliances across the site are addressed in a timely manner.

Oil Tank Farm

Several concerns were identified relating to the oil storage tank farm.

Observations included:

- Liquid contamination across the floor of the bund.
- Visible oil sheens.
- Pipework appearing to have been temporarily repaired using a rag or cloth.
- A bund constructed from single-skin blockwork.

The condition of the area raises concerns regarding both the integrity of the storage system and the effectiveness of ongoing maintenance arrangements.

The apparent condition of transfer pipework indicates the potential for existing or historical leakage. Any failure within the system could result in a significant release of oil or contaminated liquids.

The bund itself appears to be constructed from single-skin blockwork. This form of construction may not provide the level of impermeability, chemical resistance and long-term structural integrity expected of secondary containment systems and does not appear consistent with recognised good practice, including CIRIA C736 guidance.

The operator should undertake an assessment of the containment infrastructure and demonstrate that it remains fit for purpose and capable of providing adequate environmental protection.

The presence of liquid contamination throughout the bunded area further indicates either ongoing leakage, historical containment failures, inadequate maintenance or ineffective housekeeping procedures.

Additionally there are concerns regarding the bund for the oily water bulk storage tanks, as similar compliances issues with CIRIA C736 exist along with evidence of cracking in the bund floor and poor maintenance and inspection regimes.

The maintenance arrangements for onsite bulk storage and secondary containment will form part of a separate audit, however the operator should include this aspect within the proposed action plan.

Storage of Oily Water in a Skip

A large skip containing oily water was observed within the external yard. Site staff stated that it is common practice for tanker wastes to discharge into a skip when the oil separation pit has reached capacity.

A skip is not designed for the storage of free liquids and cannot be considered a suitable containment vessel for oily water.

Should the skip suffer damage, corrosion, structural failure or leakage, significant quantities of contaminated liquid could be released rapidly. Given the volume of liquid present, any release could quickly overwhelm local containment measures.

The condition of site surfacing observed during the inspection, together with the presence of damaged hardstanding and external drainage pathways, increases the likelihood that any release could:

- Enter surface water drainage systems.
- Bypass treatment infrastructure.
- Contaminate underlying soils.
- Pollute groundwater.

- Spread contamination across wider areas of the site.

The practice of using a skip for temporary liquid storage demonstrates inadequate contingency arrangements for periods when the oil separation system has reached capacity and presents a significant pollution risk.

Site staff advised that it is common practice for tanker wastes to be discharged into a skip when the oil separation system has reached capacity. NRW has seen no evidence that the storage of free liquids within skips forms part of the operating techniques approved under the permit. SGN 5.06 establishes that containers used for waste storage and handling must be suitable for the waste being stored and maintained in a condition that prevents pollution and accidents. This is therefore also seen as a **breach of Permit Condition 2.3.1(a).**

This practice should cease immediately and suitable alternative storage arrangements should be implemented.

The inspection identified systemic failures in waste storage, housekeeping, spill management and operational control that increase the likelihood of pollution and accident risks, as detailed in the sections above. Poor housekeeping and unmanaged spillages create pathways for contaminants to be mobilised across the site by vehicle movements, site activities or firefighting water, increasing the potential for releases to the environment.

In addition, hazardous waste storage arrangements were not being managed in accordance with recognised good practice. The intended co-location of multiple incompatible wastes, inadequate segregation measures, deficiencies in waste identification and labelling, and the reported practice of discharging tanker wastes into skips raise concerns regarding the suitability of storage infrastructure and the site's ability to safely manage incompatible and liquid wastes.

These failings demonstrate a departure from the permitted operating techniques and relevant guidance, including SGN 5.06 and 'How to comply with your environmental permit' both of which are permitted operating techniques. Additionally, associated HSE storage standards, which require appropriate segregation of incompatible wastes, suitable containment systems, effective spill management and clearly defined storage controls have not been met. As a result, Permit Condition 2.3.1(a) has not been complied with.

A **Category 2 non-compliance** is considered appropriate because the deficiencies were widespread and indicate a significant failure of management systems and operational controls designed to prevent pollution. While no actual pollution incident was identified during the inspection, the observed conditions and working practices substantially increased the risk of pollution, fire, chemical incompatibility incidents and emergency response complications. The non-compliances therefore represent a **significant environmental risk with a credible pollution pathway**, requiring prompt corrective action to ensure compliance and prevent future environmental harm. The following non-compliance is issued:

Non-compliance: **A Category 2 non-compliance** is issued for failing to operate in accordance with

the sites permitted operating techniques. **Permit Condition 2.3.1(a).**

NRW will investigate whether the non-compliance is attributable to failures of the site's Environmental Management System and whether further breaches of Permit Conditions 1.1.1(a) and/or 1.1.1(b) have occurred. Information to support this investigation is requested in Action 1 (**Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review)** details of which can be found further in this report.

Waste Storage and Waste Classification

A large stockpile designated by the operator as "non-hazardous soil and stones" was observed within the external yard area. Site staff advised that this location is used for the tipping, sorting and temporary storage of skip waste prior to onward transfer.

This issue was previously identified within CAR_NRW0050884; however, storage and sorting activities continue to be undertaken in this area and therefore this matter is considered to be an ongoing non-compliance.

Inspection of the stockpile identified that, whilst excavated soils and stones were present, a significant proportion of the material comprised mixed construction and demolition waste, including concrete, bricks, tiles, reinforcing steel and other building rubble.

The stockpile had been designated by the operator as "non-hazardous soil and stones"; however, no effective segregation was evident between excavated materials and the construction and demolition wastes present. The waste therefore appeared to comprise a mixed waste stream rather than a discrete soil and stones waste.

Waste classification must be undertaken in accordance with WM3 Technical Guidance and the List of Waste. The presence of concrete, bricks, tiles, metals and other demolition materials indicates that the waste cannot reasonably be described solely as soil and stones without prior segregation and assessment.

Appropriate measures guidance requires operators to have robust waste acceptance, classification, segregation and tracking procedures in place to ensure wastes are correctly identified and managed throughout the treatment process. The condition of the stockpile indicates that these controls were either absent, ineffective or not being consistently implemented.

Incorrect waste classification and inadequate segregation increase the risk of unsuitable treatment, recovery or disposal routes being selected, inaccuracies in waste tracking and reporting, and downstream operators receiving wastes that do not conform to the description provided. As such this is deemed a breach with permit condition 2.3.3, as the incorrect information has been provided to waste operation receiving the waste, as highlighted by the very low quantity of waste leaving the facility under chapter 17 01 of the EWC,

The observations indicate that waste classification, segregation and storage controls have been

inadequate for a prolonged period. The continuation of this activity following previous regulatory intervention further indicates that corrective actions have not been effectively implemented or maintained.

Whilst the incorrect description resulted in non-compliant information being provided to a receiving waste operation, there was no evidence at the time of the inspection that the waste contained hazardous materials, that pollution had occurred, or that the misclassification had led to a significant environmental impact. The principal consequence was a loss of regulatory control and confidence in the accuracy of waste tracking and classification records. The breach therefore represents a failure to adequately implement management system controls required by permit condition 2.3.3 and had the potential to result in inappropriate downstream management of the waste. However, as the actual environmental consequence was low and the impact was limited to a minor effect on the regulatory regime, as such the following non-compliance will be issued.

Non-compliance: A Category 3 non-compliance is issued for the operator failing to provide an accurate waste description to the onward receiving waste facilities in relation to mis categorised construction and demolition wastes. **Permit condition 2.3.3.**

The observations indicate deficiencies in waste classification, waste acceptance, inspection and management control arrangements. However, NRW requires further information to determine whether the issue arose from a failure to follow existing procedures, the absence of suitable procedures, inadequate staff competency, ineffective inspection arrangements, or deficiencies within the site's Environmental Management System.

Action ~ Please refer to the Action (Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review) detailed below.

Environmental Management System and Risk Assessments

The extent of the deficiencies observed during the inspection raises concerns regarding the effectiveness of the site's Environmental Management System and associated risk assessment processes.

The conditions identified suggest that foreseeable risks are either not being adequately assessed or that appropriate controls are not being effectively implemented on site.

Current risk assessments should address:

Many of the deficiencies identified during the inspection would reasonably be expected to be identified through routine inspections and management review processes, including:

- Storage of hazardous wastes in unauthorised locations.
- Absence of secondary containment.

- Poor segregation of incompatible wastes.
- Significant spillages.
- Contaminated bunded areas.
- Inappropriate liquid waste storage practices.
- Defective containment infrastructure.

Failure to maintain, implement or produce suitable procedures and risk assessments constitutes a breach of Permit Condition 1.1.1.

Conclusion

The inspection identified multiple significant deficiencies relating to waste storage, hazardous waste management, pollution prevention infrastructure and environmental management controls.

Whilst no significant pollution incident was observed during the inspection, the conditions present substantially increase both the likelihood and consequence of environmental pollution occurring. The storage of hazardous wastes in unauthorised areas, the absence of suitable secondary containment, poor segregation arrangements, inadequate housekeeping and inappropriate liquid waste storage practices collectively represent a significant risk to land, groundwater and surface waters.

Natural Resources Wales expects the operator to prioritise action in relation to hazardous waste storage, waste segregation, containment infrastructure, pollution prevention measures and management system controls.

The number, nature and extent of the non-compliances identified during the inspection raise significant concerns regarding the effectiveness of the site's Environmental Management System and associated management controls.

Whilst the inspection identified multiple operational failings, NRW has not yet determined the underlying cause of those failures. Further information is required to establish whether the issues arose from:

- the absence of suitable procedures;
- deficiencies within existing procedures;
- inadequate staff training or competence;
- inadequate supervision or management oversight;
- ineffective inspection or auditing arrangements; or
- a failure to implement otherwise adequate management controls.

In accordance with NRW guidance on the assessment of root causes, NRW will undertake further investigation before determining whether a separate breach of Permit Condition 1.1.1(a) and/or

1.1.1(b) has occurred, in line with our regulatory principles to identify the root-cause of any permit non-compliances. Further non-compliances are likely to be issued once the root-cause is identified, as these will be scored on their own merits, i.e., based on the potential risk associated with the non-compliance.

Action 1: Egan Waste Limited ~ 08th of September 2026 ~ Management System Evidence Review:

To support NRW's root cause investigation and determine whether the non-compliances identified during the inspection arose from deficiencies in procedures, implementation, competency, supervision or the Environmental Management System (EMS), the operator shall provide copies of the following documentation:

1. EMS structure, responsibilities and organisational arrangements.
2. Hazardous waste storage procedures, including requirements for secondary containment, inspection and maintenance.
1. Waste acceptance, classification, segregation and compatibility assessment procedures.
4. Evidence of procedural review, amendment and continual improvement undertaken as part of the EMS review process.
5. Records demonstrating that relevant personnel have been trained and assessed as competent in the above procedures.
6. Inspection records for hazardous waste storage areas, secondary containment systems and pollution prevention infrastructure. Internal audit reports completed within the last 12 months.
7. Internal audit reports, compliance reviews or other assurance activities completed within the last 12 months that assessed compliance with hazardous waste storage requirements and EMS controls. Staff training and competency records relevant to waste management activities.
2. Fire Prevention and Mitigation Plan (FPMP) inspection records.
9. Corrective action, improvement and non-conformance records from the last 12 months.
10. Management review records completed within the last 12 months.
11. Details of any previous findings relating to the absence or inadequacy of secondary containment, together with evidence of any corrective actions implemented.
12. A copy of the most recent ISO 14001 audit report.

To note, the last 12 months refers to dates falling between the 31/08/2025 and the 31/08/2026. Where no date is specified, provide documentation in line with the request. If any of the information is not available, provide a statement summarising this fact and a reason as to why. **The above information must be provided to NRW by the 31st of October 2026.**

Action 2 ~ Egan Waste ~ 08th of September 2026 ~ Compliance improvement plan: Egan Waste shall submit a comprehensive written compliance improvement plan to NRW detailing the measures that will be implemented to restore and maintain compliance with the permit.

The number, nature, significance and recurrence of the non-compliances identified during the inspections undertaken on 14 July 2026 and 19 August 2026 raise serious concerns regarding the effectiveness of site management, operational controls, pollution prevention measures and compliance assurance arrangements.

The improvement plan must identify:

- each non-compliance identified within this CAR form;
- the underlying cause of the non-compliance;
- the corrective actions required to restore compliance;
- the preventative measures that will be implemented to prevent recurrence;
- the person responsible for delivery of each action;
- the timescales for completion; and
- the evidence that will be provided to NRW to demonstrate completion.

NRW recognises that some infrastructure improvements and management system changes may require a phased implementation programme. However, this does not remove the operator's obligation to ensure that risks of pollution are adequately controlled. Immediate measures must therefore be implemented, where reasonably practicable, to reduce environmental risks whilst longer-term solutions are developed and implemented.

The plan must clearly prioritise actions according to risk and demonstrate how the highest-risk issues will be addressed as a matter of urgency. In particular, priority must be given to hazardous waste management, secondary containment, fire prevention measures, waste segregation, pollution prevention infrastructure and management system controls.

NRW expects the improvement plan to provide sufficient detail to enable progress against each action to be monitored and assessed. Generic statements of intent or broad commitments to review arrangements will not be considered adequate.

As a minimum, the improvement plan shall address the following matters:

1. Hazardous Waste Storage and Segregation

- Removal of all hazardous wastes from unauthorised storage areas.
- Provision of designated storage locations for each hazardous waste classification.
- Review and implementation of a hazardous waste compatibility matrix.

- Segregation of incompatible waste streams in accordance with hazard properties and recognised guidance.
- Installation and maintenance of appropriate signage identifying waste types and hazards.
- Procedures to ensure hazardous wastes are correctly identified and segregated upon receipt.

2. Secondary Containment and Pollution Prevention

- Provision of secondary containment for all hazardous aqueous wastes and other liquids capable of causing pollution.
- Assessment of all internal storage areas to determine whether buildings provide suitable equivalent containment.
- Deployment and use of pallet bunds and other containment infrastructure.
- Inspection and maintenance programme for all bunds and containment systems.
- Measures to prevent contaminated liquids escaping from buildings and storage areas.
- Review of spill response arrangements and spill kit provision.

3. Recycling Building Improvements

- Removal of historical spillages and contaminated absorbents.
- Cleaning and housekeeping improvements throughout the building.
- Segregation and classification of all laboratory chemicals and laboratory smalls.
- Completion of the proposed external chemist review and removal of inappropriate stocks of hazardous waste.
- Establishment of designated and clearly marked storage areas for individual waste streams.
- Assessment of floor integrity and suitability for hazardous waste storage.

4. Drum Store Improvements

- Arrangements to ensure containers remain closed when not in use.
- Ongoing inspection and maintenance of bunded areas.
- Review of waste acceptance procedures relating to potential healthcare/sharps wastes.
- Review of storage arrangements for toxic and flammable wastes.

- Routine housekeeping and inspection programme.

5. Fire Prevention and Mitigation Plan Compliance

- Full review of site operations against the approved FPMP.
- Identification and closure of all gaps between actual site operations and FPMP requirements.
- Removal of unauthorised combustible and hazardous waste storage arrangements.
- Review of fire loading and storage layouts.
- Review of battery storage arrangements and separation distances.
- Revision of daily inspection procedures.
- Staff training on FPMP requirements.
- Consideration of whether the FPMP remains accurate and fit for purpose.

6. Oil Tank Farm and Bulk Liquid Storage

- Engineering assessment of the tank farm bunds against CIRIA C736 standards.
- Assessment of the oily water tank bund integrity.
- Investigation of all evidence of leakage and contamination.
- Repair or replacement of damaged pipework.
- Cleaning of contaminated bund areas.
- Formal inspection and maintenance regime for tanks, pipework and bunds.
- Evidence demonstrating all containment infrastructure remains fit for purpose.

7. Oily Water Storage Arrangements

- Immediate cessation of storing oily water within skips.
- Identification and implementation of suitable temporary and permanent liquid storage arrangements.
- Contingency arrangements for periods when oil separation infrastructure reaches capacity.
- Written procedure for tanker waste acceptance and storage.

8. Waste Classification and Acceptance Procedures

- Review of waste classification procedures.
- Review of waste acceptance checks.
- Measures to ensure construction and demolition wastes are correctly classified.
- Staff training on EWC coding and waste classification.
- Procedures to ensure waste descriptions are periodically verified.

9. Site Infrastructure

- Assessment of all hardstanding surfaces.
- Identification and repair of cracked or damaged surfacing.
- Assessment of drainage pathways.
- Identification of areas where pollutants could enter the ground.
- Timescales for repair and maintenance works.

10. Environmental Management System (EMS)

The EMS review should be a key part of the action plan and should include:

- Root cause analysis of the identified non-compliances.
- Review of environmental risk assessments.
- Review of management inspection arrangements.
- Review of housekeeping procedures.
- Review of hazardous waste management procedures.
- Review of training and competency arrangements.
- Review of incident reporting arrangements.
- Review of corrective and preventative action procedures.
- Review of document control and implementation of procedures.
- Identification of management responsibilities and accountability.

11. Training and Competence

- Training needs analysis for operational staff and management.
- Refresher training on hazardous waste management.
- Training on waste classification.
- Training on spill response and pollution prevention.
- Training on FPMP requirements.
- Training records and competency assessments.

12. Monitoring and Verification

For each action the operator should provide:

- A responsible person.
- A target completion date.
- Evidence that will be provided to NRW to demonstrate completion.
- Timescales for follow-up audits or inspections.

The action plan should be provided to NRW by the 01st of October 2026. Failure to do so will result in an escalation of NRW's enforcement response.

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.