

Compliance Assessment Report CAR_NRW0052920

Permit being assessed: CB3398ZF.

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

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

Type of assessment: Audit,

Reason: Routine.

On: 10/09/2026.

Parts of permit assessed: 2.3.2.

NRW Lead Officer: Dale Padfield.

Report sent to: ~, SHEQ Manager, on 10/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2D - Installations - Operations - Technical requirements	Assessed (A)	

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?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Forward Waste Management Ltd

EPR/CB3398ZF

This compliance assessment report (CAR) details the review of the information requested as part of the waste audit detailed in CAR_NRW0052403.

Question 1: Titanium Sludge – Potential Organic/Oil Contamination

The response partially addresses the concern regarding potential organic contamination within the titanium sludge waste stream. The operator has confirmed that a visual inspection was undertaken and no evidence of oil contamination was observed, and has further stated that oil detection strips will be incorporated into future assessment procedures. In addition, the waste producer has declared that no organic compounds are used or generated within the process producing the waste. Whilst this demonstrates that the issue has been considered and that confirmation has been sought from the producer, the conclusion relies primarily on process knowledge, visual inspection and producer declaration rather than analytical evidence capable of identifying dissolved, emulsified or otherwise non-visible organic contaminants.

Question 2: Titanium Sludge – EWC Code Selection

The response satisfactorily addresses the query regarding the use of EWC 16 03 04. The operator has confirmed that the code was originally selected by the waste producer and had previously been accepted. Following review of the waste classification hierarchy and further discussion with the producer, it has been acknowledged that EWC 12 01 15 is a more appropriate code for this waste stream and that this code will be applied going forward. The response demonstrates that the classification has been reviewed and corrective action agreed, although it does not provide detailed justification for why the original coding was accepted.

Request 1: Grit Blast Waste – Blasting Media, Substrate and Uncharacterised Fraction

The information requested has largely been provided. The operator has confirmed that the blasting media is Guyblast thermoset urea plastic media and has supplied the associated safety data sheet. The materials being blasted have been identified as stainless steel, titanium alloys and nickel alloys. The apparent discrepancy between the waste description and the XRF analytical results has been explained on the basis that the majority of the blasting media consists of polymeric material which would not be detected by XRF analysis, resulting in only a relatively small proportion of the overall sample mass being characterised. This explanation is technically plausible and provides a reasonable justification for the analytical results, this is based on process knowledge rather than direct analytical verification of the uncharacterised fraction.

Request 2: Historical Analytical Data

The request for historical analytical information has been adequately addressed. The operator has provided a previous analysis report dated 4 July 2025, which predates both the waste consignment under review and the NRW request for information. This provides evidence that analytical assessment of the waste stream was undertaken prior to the current compliance assessment and resolves the concern that the analysis may have been commissioned solely in response to regulatory enquiries.

Question 3: Rusty Salt Water Waste – Potential Organic Contaminants

The response addresses the question regarding the potential presence of oils, surfactants, hydrocarbons or other organic contaminants within the rusty salt water waste stream. The waste producer has confirmed that no organic compounds are present within the generating process and a waste declaration form has been provided in support of this position. Additional process information has also been supplied, describing the waste as arising from an electrode deburring process using a salt-water solution, with pH monitoring undertaken as part of routine operations. The operator has further stated that the receiving disposal facility undertakes visual and olfactory inspections and would identify indicators such as oil sheens, foaming or strong odours if present.

To conclude, the operator has satisfied the requests of the audit. The operator is reminded that, the hierarchy of applying EWC codes, as described by appendix A of technical guidance WM3 should be followed when EWC codes are assigned.

The operator should also ensure where a mirror non-hazardous code is applied, robust evidence is available, in-line with WM3 guidance, to correctly classify the waste as non-hazardous, as all wastes with a mirror entry code are hazardous by default until proven otherwise.

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.