Compliance Assessment Report CAR_NRW0052116

Permit being assessed: EP3935UC.

For: Waunarlwydd Works, **held by:** Swan Alloy Uk Ltd

At: Waunarlwydd Works, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 14/09/2026.

Parts of permit assessed: 2. Operations, 3. Emissions and Monitoring.

NRW Lead Officer: Kirsty Thomas, accompanied by Liane Bacon-Weekes.

Report sent to: Swan Alloy UK Ltd, HSE Manager, on 14/09/2026.

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	C3 Minor	2.3.3(b)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR2D	Action REF CAR_NRW0052116.1 -Waste streams such as 10 03 16 must have relevant evidence available to demonstrate the non-hazardous classification. Where not available, waste must be classified as hazardous and managed accordingly - Immediate effect.	14/09/2026
IR3A(1)	Action REF CAR_NRW0052116.2 - Please provide any available information on the oil interceptor including details of any assessments to confirm it remains fit for purpose (e.g.	30/09/2026

Criteria	Action needed	Complete by
	adequately sized and appropriate class of separator being used), as well as its expected design life.	

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

This Compliance Assessment Report (CAR) documents Natural Resources Wales' (NRW's) assessment of information submitted following a waste audit undertaken at the site, as previously recorded in compliance report CAR_NRW0051598.

The following outlines the actions set, the operator's response, and NRW's comments.

Waste received

Action REF CAR_NRW0051598.1 - Confirm whether the waste received for the waste consignment note ARCONI/00038 is dross (10 03 09)* or skimmings (10 03 15)*. Please ensure that both the description and the LoW code are consistent and accurate across consignment notes and quarterly hazardous waste returns

The consignment note remains with the description of aluminium dross and LoW code as 10 03 15* - skimmings.

Similar concerns were flagged for consignment note ARCONI/0087 (see action 2 below) and linked to action 3. Information provided by the operator indicated that suppliers interchangeably use the terms for dross and skimming. In this particular case, we acknowledge the interchangeable use of terms. However please be mindful that this is not acceptable for other waste streams. You must ensure waste descriptions and codes are accurate, and obtain sufficient evidence, from the producer, to demonstrate the appropriate assessment and classification has been undertaken.

Facilities receiving waste have a legal obligation under the Duty of Care (Environmental Protection Act 1990, Section 34) to ensure that any waste accepted is described accurately and sufficiently. There is also a legal requirement to submit quarterly returns to the Regulator that are complete and accurate, to support the effective tracking of hazardous waste movements.

Further discrepancies may result in additional enforcement action being taken by NRW officers.

Waste pre-acceptance and acceptance documentation should include details of the waste

source and the process that generated it. The documentation must demonstrate that appropriate due diligence has been undertaken and must be available for inspection upon request by NRW officers at any time.

Additionally, in regards to waste received, NRW received a copy of the hazardous waste consignment note NOVELI/05610 as requested. Whilst the description and LoW code are both for dross it is noted that the Part E was incomplete. You must complete Part E of the Consignment Note (CN). This is a legal requirement under Regulation 36 of the Hazardous Waste (Wales) Regulations 2005, which states that, upon receiving the consignment, the consignee must “complete Part E on both copies”. Part E should be fully completed, signed, and dated when the waste carrier arrives at the receiving site.

As previously highlighted, Additional information on completing consignment notes is available on our website.

Action complete - See advice and guidance above.

Action REF CAR_NRW0051598.2 - Please advise on whether consignment note ARCONI/0087 is for dross 10 03 09* or skimmings 10 03 15*.

Consignment note ARCONI/0087 has inconsistent waste codes and description - recorded as aluminium dross but with the LoW code for skimmings(10 03 15*).

See advice and guidance as per action 1 (Action REF CAR_NRW0051598.1) above.

Action complete - See advice and guidance above.

Action REF CAR_NRW0051598.3 - Under the Hazardous Waste (Wales) Regulations 2005, you are required to accept hazardous waste only where it is accompanied by a correctly completed consignment note. Please ensure that you verify with your suppliers that the waste has been accurately described and classified, and that all relevant hazard codes are fully and correctly recorded on the consignment note.

Evidence has been provided by the operator showing contact made with ARCONI.The operator shared email exchanges between themselves and the supplier where the wording for skimmings and dross appear to be used interchangeably. It is unclear if other suppliers such as Alvance Aluminium have been contacted to verify that wastes are descriptions and LoW codes are correctly reorded on consignment notes.

See advice and guidance as per action 1 (Action REF CAR_NRW0051598.1) above.

Following our email of 07/05/2026, which provided guidance and support to help resolve this issue, it appears that the skimmings (10 03 15*) received from Scotland, referenced as "Highland" on the EPR returns, remain omitted from the Q3 and Q4 2025 Hazardous Waste Consignee Returns.

Please refer to the email and submit amended returns by 18/09/2026. Please notify

your site officer once this action is complete.

Action overdue

Action REF CAR_NRW0051598.4 - provide further information on the Bridgnorth Aluminium ltd skimmings waste stream, including the process that produces it.

The operator sought additional information from Bridgnorth stating that skimmings are generated from the casting of slag at the Bridgnorth facility. A Photo of furnace at Bridgenorth shown and skimming's can be seen.

Waste coded 10 03 15* and 10 03 16 are assessed and assigned hazardous on the basis of the waste displaying hazardous property HP3 Flammable or containing Persistent Organic Pollutants (POPs). For HP3, a waste may be hazardous where it contains a substance assigned the hazard statements H260 or H261 and is capable of releasing a highly flammable gas at a rate exceeding 1 litre of gas per kilogram of substance per hour when in contact with water. Further information on the relevant testing and assessment criteria is provided on page C11 in the Waste Classification: Guidance on the Classification and Assessment of Waste (Technical Guidance WM3).

Although your permit authorises the acceptance of both waste codes, you are still required, as part of your Duty of Care obligations and pre-acceptance procedures, to obtain sufficient evidence from the waste producer to demonstrate that the waste has been appropriately assessed and classified. This will include testing for flammability and POPs and is particularly important where a mirror non-hazardous entry has been assigned. This evidence should be retained and made available for inspection upon request.

Action compete

Action REF CAR_NRW0051598.5 - Please bring to the attention of Hydro that waste carrier details on the duty of care documentation is incorrect.

The operator provided evidence to confirm they have brought to the attention of Hydro that the waste carrier details on the duty of care documentation is incorrect.

Action complete

Action REF CAR_NRW0051598.6 - Provide further details on the origin and production process of the skimmings waste stream being received from Egan Waste Ltd.

The operator has confirmed that the skimmings come from Design Group (Penallta Industrial Estate, Hengoed). A Vacuum Metallizer is used to melt aluminium wire in a chamber; this is then vaporized and attaches to either polyester or paper to create a thin uniformed metallic layer. The Aluminium dross is the buildup of the unused melted

aluminium that builds on the inside of the chamber.

It is noted in the email between yourself and the company that without testing they determine their waste to be hazardous and coded 10 03 15*. We acknowledge your response in confirming that the classification was unsatisfactory and further shipments were restricted until additional testing had been completed.

There is some confusion however, as the submitted Waste Transfer Note titled *"Egan Waste"* shows the waste producer of 5,000kg of aluminium waste (10 03 16 Skimmings) as Glatfelter Caerphilly Ltd located at Pontygwyndy Industrial Estate, Caerphilly.

Please provide documentation to demonstrate the appropriate testing. If you are receiving 10 03 16 coded waste from Egan from multiple source, the evidence of testing should be provided for each producer.

Action complete - however, documentation to demonstrate appropriate testing for waste streams 10 03 16 is outstanding. A similar action for this information is requested as per
Action REF CAR_NRW0051598.8 and will be picked up under this action. See action below for further details.

Action REF CAR_NRW0051598.7 - Clarify whether the material received from Ashvin Metals Ltd is dross or skimmings and provide further details on the origin and production process.

A waste transfer note was provided in response to this action. The LoW is of 10 03 16 has been used as is described as dross. As with action 1 above, the waste description and code are conflicting (recorded as dross but with the LoW code for skimmings(10 03 16)).

No details on the process producing this has been provided or evidence to demonstrate waste is suitably classified as a non-hazardous waste code.

Please be aware that if a producer has not completed the necessary testing to determine whether their waste should be classified and coded under the non-hazardous mirror entry, the waste must be classified and exported as hazardous until the required testing has been undertaken and the classification confirmed.

Action overdue - Provide information immediately, including any pre-acceptance checks for this waste stream.

Action REF CAR_NRW0051598.8 - Please can you provide the information you have demonstrating the non-hazardous classification for each of your suppliers (10 03 16 Skimmings).

Bridgnorth Aluminium Ltd:

Evidence provided was satisfactory.

Elval:

Evidence provided in regards to the waste classification. Analysis details were provided to demonstrate the material does not display hazardous properties or exceed the hazardous substance threshold. Evidence was provided to show the skimming's have been tested for flammability. However, scale of the sampling is not clear.

Swan Alloy must ensure their pre-acceptance checks verify classification information is sufficient and can confidently evidence appropriate waste classification.

Hydro Ltd:

No information provided.

Egan Waste Ltd (Design Group and Glatfelter (or any other producer)):
No evidence is available to demonstrate the non-hazardous classification for waste stream 10 03 16 Skimmings. Email information between the operator and their supplier stated testing to determine the waste code 10 03 16 had not been completed. Therefore, without such testing, waste must be coded as 10 03 15* skimmings that are flammable or emit, upon contact with water flammable gases in hazardous quantities.

Compliance breach - Accepting a waste that hasnt been appropriately assessed and therefore misclassified/mis-coded is considered an offence. Such offences is considered a permit contravention against permit condition 2.3.3(b). Consequently, a non-compliance score of C3 has been attributed against compliance criteria (IR2D) - Technical requirements.

Action REF CAR_NRW0052116.1 - Waste streams such as 10 03 16 must have relevant evidence available to demonstrate the non-hazardous classification. Where not available, waste must be classified as hazardous and managed accordingly.

As per the advice and guidance, please ensure pre-acceptance checks are robust enough to obtain evidence from the producer to support classification.

Ashvin Metals Ltd
No information provided.

Action incomplete and overdue. Additional action also included as above.

Other wastes

Action REF CAR_NRW0051598.9 - Please ensure that all waste received on site is accompanied by accurately completed Duty of Care documentation. Further guidance on completing Waste Transfer Notes is available on our website. Natural Resources Wales / Completing waste transfer notes. Please send a copy of a waste transfer note for the metallics accepted on site

A Waste Transfer Note for the metallics was provided and appeared correct.

Action complete.

Please ensure you ensure compliance with duty of care requirements and the requirements of permit condition 2.3.3 ie waste shall only be accepted if (b) conforms to the description in the documentation supplied by the producer and holder. Internal audits to check compliance with such requirements must form part of your EMS.

Action REF CAR_NRW0051598.10 -The Operator is required to confirm whether an oil-water interceptor was previously installed on site and, if so, when it was removed. The Operator should also clearly describe the current mitigation measures in place to protect surface waters prior to discharge.

The operator has confirmed and provided evidence to show there is in fact an oil (petrol) interceptor downstream of the sluice gate (onsite sump/chamber). The interceptor is understood to have been installed prior to the site opening in 1997.

Inspections are carried out on the interceptor at 6 monthly intervals by an external provider. Next inspection is due July 2026 and is to include an integrity inspection. The latest inspection report (January 2026) provided, notes the interceptor as a class 2 bypass. Given the age of the interceptor and limited detail available, it is not known if the interceptor complies with relevant modern standards. If not already done, a review of the class of interceptor installed should be undertaken.

This action is complete, however there is a subsequent action as follows:

Action REF CAR_NRW0052116.2 - Please provide any available information on the oil interceptor including details of any assessments to confirm it remains fit for purpose (e.g. adequately sized and appropriate class of separator being used), as well as its expected design life.

Action REF CAR_NRW0051598.11 - Provide a copy of the duty of care documentation for the export of waste stream 16 10 02

Waste Transfer Note provided and appears correct.

Action complete.

Action REF CAR_NRW0051598.12 - Please ensure you obtain confirmation of received from your hauliers for Hills Waste Solution, 10 03 20 -flu gas dust waste stream.

Waste Transfer Note provided and appears correct.

Action complete.

Action REF CAR_NRW0051598.13 - Provide a copy of the duty of care documentation for the export of 16 11 04 other linings and refractories from metallurgical processes

Waste Transfer Note provided and appears correct.

Action complete.

Action REF CAR_NRW0051598.14 - Please forward a copy of this consignment note CDZ837/27225 once located.

Hazardous waste Consignment Note provided and appears correct.

Action complete.

Action REF CAR_NRW0051598.15 - Provide a summary of staff training packages to be delivered.

A training summary has been provided; however, the training package is somewhat high-level. More detailed and specific training is required. This should include instruction on the completion and review of WTN/HWCN documentation, as well as ensuring staff are competent in verifying that accepted wastes are supported by sufficient evidence to demonstrate correct waste classification.

Action complete - however please action the above advice and guidance

---

Previous CAR actions

The below overdue actions must be progressed immediately.

Action	Details	Status
	Previous CAR Form actions - CAR_NRW0049879	
2	Action Ref - CAR_NRW0049879.2- Provide Certificates of Technical Competence (CoTC) (for the operator) of an appropriate and approved competence scheme as required by condition 1.1.4.	**Action complete** - CoTC provided for; VRQ401, VRQ402, VRQ403, VRQ404, VRQ405, VRQ413, VRQ415 and HROC6. Certificates provided.

	Previous CAR Form actions - CAR_NRW0050552	
1	Action Ref - CAR_NRW0050552.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the oil and grease exceedance incident	**Action complete** - Response provided 07/07/2026. A root cause investigation into the oil and grease permit limit exceedance was completed; however, the findings were inconclusive. Prevention measures - Along with daily cleaning, 6 monthly interceptor inspections are in place with no oil/grease observed during the July 2025 visit prior to the October permit limit exceedance. Swan Alloy should consider an alarm system for the interceptor. recommended by their contractor. Action set above in regards to suitability of current oil intereceptor.
	Previous CAR Form actions - CAR_NRW0051688	
2	ACTION - Swan Alloy to undertake a thorough review and update of their Pest Management Plan (PMP) to ensure robust measures are in place for preventing and minimising the presence of pests. particularly flies. Submit PMP to NRW.	**Overdue**
	Previous CAR Form actions - CAR_NRW0051598	
1-15	Action Ref - CAR_NRW0015198.1 - CAR_NRW0015198.15. See report for details	All action complete except for the following: Action Ref- CAR_NRW0015198.3 CAR_NRW0015198.7 CAR_NRW0015198.8
	Previous CAR Form actions - CAR_NRW0051674	
1	Action Ref - CAR_NRW0051674.1 - Swan Alloy to provide a summary of the root cause investigation conclusions and further actions agreed to prevent recurrence of the aluminium exceedance incident.	**Overdue**
2	Action Ref - CAR_NRW0051674.2 - Swan Alloy must submit revised waste returns for Q1 2026 ensuring the form is complete and correctly formatted.	**Overdue**

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.