Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0052994

Permit being assessed: UP3998FB.

For: Celtic Recycling Ltd, **held by:** Celtic Recycling Ltd

At: Pyle, Bridgend, Glamorgan, CF33 6BZ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/08/2026 between 12:45 and 13:45.

Parts of permit assessed: W1A, W2A, W2D, W3D, W4B.

NRW Lead Officer: Daniel Hopkin, accompanied by Craig Coleman.

Report sent to: TCM , Alun Williams , on 18/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4A - Waste - Information - Records	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?

Criteria	Action needed	Complete by
W1A	Please send NRW your EMS to update our records.	02/10/2026
W1A	Please supply your discharge consent from DCWW to update our records.	02/10/2026
W1A	Please ensure that the impermeable surface is repaired and kept in a good condition throughout the site.	02/10/2026

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.

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

Celtic Recycling Ltd - EPR/UP3998FB

Waste Regulation Officer Daniel Hopkin and Senior Waste Regulation Officer Craig Coleman attended the permitted facility of Celtic Recycling Ltd at Unit 37, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BZ on the 26th of August 2026. Celtic Recycling Ltd hold a Teir 3 bespoke permit for a hazardous and non-hazardous mixed metal waste treatment facility.

This was a routine unannounced site inspection, Officers were also investigating a report received to NRW of burning at the site.

During the inspection we were met by the site's Technically Competent Manager(TCM) Alun Williams, who shown us around and answered our questions. The weather was warm and dry during the inspection, we arrived at 12:45.

There were no breaches recorded on site during this visit.

W1A – General Management

Permit condition 1.1.1 states, *"The operator shall manage and operate the activities:*

a. *In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints."*

During the inspection, officers were shown the site's Environmental Management System (EMS). The documentation was readily available and accessible upon request. This demonstrates

compliance with Permit Condition 1.1.1.

Also permit condition 1.1.4 states, *"The operator shall comply with the requirements of an approved competency scheme."*

On return to the office a desktop review of your sites TCM certification was completed. The TCM achieved their continued competency on the 26/02/2026.

Action: Please send NRW your EMS to update our records. Please send this by the 2nd of October 2026.

The sealed drainage system was observed to be clear and in good condition, with no debris identified that would block the flow of surface water. Water was able to flow freely through the drainage channels towards the interceptor. The interceptor itself was not opened or inspected during the visit. The operator advised that Celtic Recycling Ltd discharges to the foul sewer under a trade effluent consent issued by Dŵr Cymru Welsh Water (DCWW).





Action: Please supply your discharge consent from DCWW to update our records. Please supply this by the 2nd of October 2026.

During the inspection, waste was appropriately segregated throughout the site, with clear signage displayed across operational areas. Metals were being separated into distinct storage areas, including ferrous and non-ferrous metals, and the waste segregation arrangements appeared effective, with clearly identifiable storage locations for different material streams. The waste cutting area was clearly defined and well organised. Overall, the site was observed to be clean and tidy. Additionally spill kit equipment was available if required.





The impermeable surface across the site was generally in good condition. However, one area was noted to require repair, as a small amount of rutting had developed, resulting in pooling of water, the TCM advised that this was due to be repaired.

Action: Please ensure that the impermeable surface is repaired and kept in a good condition throughout the site.

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W2A – Permitted Activities

During the inspection, all hazardous and non-hazardous waste observed on site was being stored on an impermeable surface with a sealed drainage system. All storage and treatment activities involving PCBs were contained within a building. Treatment activities observed during the inspection were consistent with those specified in Table S1.1 of the permit, and no treatment of waste batteries or accumulators were observed. Based on observations made at the time of the visit, the site was operating in accordance with the relevant permit requirements relating to waste storage and treatment activities.

W2D – The Site

The site has appropriate security measures, these include high perimeter fencing and lockable access gates. No waste activities or storage were seen extending beyond the permitted site boundary, which is consistent with the requirements of permit condition 2.2.1.

W3D – Noise and Vibration

NRW has received reports alleging that the site is generating high noise levels and causing disturbance to nearby residents. However, this was not substantiated during the inspection, the site was operating under normal working conditions, and no noise or vibration issues were identified by officers at the time of the visit. Should NRW continue to receive noise complaints relating to the site, Celtic Recycling Ltd may be required to develop and implement a Noise and Vibration Management Plan, subject to NRW approval, to identify and mitigate any potential impacts.

As a reminder, Celtic Recycling Ltd should ensure that all activities are carried out in accordance with the Environmental Management System (EMS) and permit requirements under permit condition 3.3.1. Emissions from activities should be free from noise and vibration at levels likely to cause pollution or nuisance beyond the site boundary.

W4B – Records

All waste returns have been submitted and were up to date at the time of the inspection. This is compliant with permit condition 4.2.2. The operator is reminded to continue submitting waste returns within the required timescales to ensure ongoing compliance with permit requirements.

Burning

NRW have received a report alleging that waste was being burned at the Celtic Recycling Ltd site. During the inspection, no evidence of waste burning was observed. It was noted that the site uses an oxy-fuel cutting torch to process large metal items into smaller pieces for recycling. This activity may appear to be waste burning to individuals unfamiliar with the process. The use of this equipment forms part of the site's permitted activities and Celtic Recycling Ltd is authorised to undertake this activity in their permit under Table S1.1. However, as a reminder, the permit states that, "The burning of any waste, either in the open, inside a building, or in any form of incinerator, is not permitted." Celtic Recycling Ltd should ensure continued compliance with this permit condition.

Questionnaire

As part of this inspection, NRW officers completed a questionnaire relating to wastes being removed from site under EWC 19 12 12 - Other wastes (including mixtures of materials) from mechanical

treatment of wastes other than those mentioned in 19 12 11*.

The purpose of the questionnaire was to establish how this waste stream is generated, how it is classified, and whether the classification has been undertaken in accordance with current waste classification guidance. NRW is undertaking work across the regulated sector to better understand waste outputs generated from permitted waste treatment facilities and to ensure that waste streams are being appropriately described, assessed and managed.

During the inspection, the operator advised that waste classified as 19 12 12 consists of materials removed during the treatment and recovery of incoming metal waste. Examples provided included wood, plastic, soil, stone, concrete and other non-metal materials which are separated from incoming wastes during the recovery process. The operator explained that these materials are placed into a single skip and removed from site periodically when the skip becomes full.

NRW acknowledges that these materials arise from waste treatment activities undertaken on site. However, EWC 19 12 12 forms part of a mirror entry and is paired with 19 12 11* - Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances. As with all mirror entries, an assessment must be undertaken in accordance with WM3: Guidance on the Classification and Assessment of Waste to determine whether the waste should be classified as hazardous or non-hazardous.

WM3 requires waste producers to consider the nature of the incoming waste, the processes undertaken, the substances likely to be present within the waste, and, where necessary, undertake representative sampling. The assessment must provide sufficient evidence to demonstrate why a waste has been assigned either the hazardous or non-hazardous mirror entry.

At the time of the inspection, the operator was unable to provide evidence that a documented WM3 assessment had been undertaken for this waste stream. No evidence was available to demonstrate that representative sampling, analysis or assessment had been completed to establish whether the mixed output stored within the skip exhibits hazardous properties or contains hazardous substances.

The waste stream described during the inspection consists of a mixture of materials originating from a variety of incoming waste sources. These materials may include substances that have the potential to contain hazardous components. In the absence of a documented assessment completed in accordance with WM3, NRW cannot be satisfied that the non-hazardous mirror entry, 19 12 12, has been appropriately assigned.

NRW therefore advises that the operator reviews the classification of this waste stream. In the absence of a WM3 assessment demonstrating that the waste is non-hazardous, NRW would expect the operator to classify the material using the hazardous mirror entry 19 12 11*. Alternatively, the operator may choose to segregate the waste into its individual waste streams, for example wood, plastics, concrete, soils and stones, and classify each waste stream separately using the most appropriate EWC.

Accurate classification ensures wastes are transferred under the correct description, transported and received by appropriately authorised facilities, and managed in a manner that protects human health and the environment. Failure to adequately assess mirror-entry wastes can result in hazardous materials being misdescribed and entering inappropriate waste management routes.

NRW therefore expects the operator to review the current classification methodology for this waste

stream and either,

- Undertake and retain a documented WM3 assessment, supported by representative sampling where required, to justify the use of EWC 19 12 12.
- Classify the waste using EWC 19 12 11* until evidence demonstrates that the non-hazardous mirror entry is appropriate.
- Segregate the waste into individual waste streams and classify each stream separately using the relevant EWC.

This will ensure that the waste is classified in accordance with WM3 and that sufficient evidence is available to justify the assigned classification.

Thank you for your time during the inspection. The site inspection concluded at 13:45.

If you have any queries regarding this Compliance Assessment Report, please contact me on the details below.

Daniel Hopkin
Daniel.Hopkin@CyfoethNaturiolCymru.gov.uk

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores
The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Waste compliance criteria (used in section 1 and 2):

1. Management
- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations
- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring
- W3A(1) – Emissions to water
- W3A(2) – Emissions to air
- W3A(3) – Emissions to land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information
- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response
Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice
You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line
If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.