Compliance Assessment Report CAR_NRW0053095

Permit being assessed: BS6149IQ.

For: Pencoed Rockwool EPR/BS6149IQ, **held by:** Rockwool Ltd

At: Rockwool Ltd , Bridgend , Mid Glamorgan , CF35 6NY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 17/09/2026 between 09:00 and 17:00.

Parts of permit assessed: IR2C.

NRW Lead Officer: Brigid Armstead, accompanied by Geraint Harris, Natalie Wrangham.

Report sent to: Pencoed Rockwool, Pencoed Rockwool, on 30/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.3.1(a)

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
IR2C	Investigate and provide the root cause(s) that led to waste generated during the shutdown being stored within the Raw Materials Yard. Submit a corrective action plan identifying measures to prevent recurrence, including arrangements for segregation, storage, containment and timely removal of wastes arising from future shutdown activities. The response should also identify the nature, source, quantity and intended management route of the waste observed during the inspection.	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

Natural Resources Wales Officers BA, GH and NW attended Rockwool Pencoed site on 17th September 2026 for a meeting and site inspection. The meeting and site tour was attended by the Rockwool Pencoed Environmental Manager.

A meeting was held to discuss progress with containment and remediation of the Raw Materials Yard (RMY), slope spoil, Dormouse corridor and associated stream.

Rockwool provided an update on recent monitoring which showed an improvement in the stream water quality since the processing of fines ceased in December 2025.

Plans for the RMY include a hard standing with housed storage bays with roof and sides. The drainage plan for this area is currently being developed. Rockwool advised that they are reviewing remediation options for the RMY and associated slope with potential to include an interceptor system. Rockwools draft remediation plans submitted 17th April 2026, included the removal of tipped materials from the contaminated slope. This was assessed by NRW Geoscience team and is considered a reasonable remediation measure because it addresses the primary contaminant source.

Action 1: NRW notes that the current remediation strategy assessed by NRW Geoscience included removal of contaminated materials from the slope. Should the proposed remediation approach materially change, NRW may require submission of revised documentation.

Following review of the Rockwool Geoenvironmental report received 1st April 2026, the NRW Geoscience team commented that direct remediation of the wetland itself may not be necessary at this stage and could potentially cause greater environmental disturbance. A programme of post-remediation wetland monitoring should be used to demonstrate recovery and determine whether any residual contamination within the wetland continues to pose a risk.

An action has been set in CAR_NRW0052884 requiring an Environmental Management Plan (EMP) and a Construction Environmental Management Plan (CEMP) for the remediation of the bank spoil contamination from the RMY.

NRW officers visited the Dormouse corridor and noted that the stream was in flow, but with only a slight intermittent trickle coming from the monitoring point ‘side stream’ which goes from the bog below the RMY to the stream.

During the site visit, officers did not observe water discolouration or visible sheens that had been recorded during previous inspections. This is consistent with the recent monitoring results indicating

improvements in water quality following cessation of fines processing in December 2025. The slope from the RMY to the bog remains in place and with spoil material visible.

The RMY was visited and could be seen to be mostly cleared with a segregated area being used for the breaking of iron skulls. A pile of mixed waste materials generated during shutdown cleaning activities was observed stored directly on the unsurfaced Raw Materials Yard. As the waste may have the potential to generate contaminated runoff, NRW considers that storage on an uncontained surface created a risk of pollution. NRW therefore considers this to be a breach of permit condition 2.3.1(a). **A Category 3 CCS score has been assigned.**

NRW notes that the Raw Materials Yard remains the subject of an ongoing remediation programme following contamination of the adjacent slope, wetland and watercourse. Although water quality observations during this visit appeared improved, spoil material remains present and remediation works have not yet been completed. NRW therefore expects activities undertaken within the RMY to be carefully controlled to minimise the risk of further contamination and to support recovery of the affected environment.

Action 2: Investigate and provide the root cause(s) that led to waste generated during the shutdown being stored within the Raw Materials Yard. Submit a corrective action plan identifying measures to prevent recurrence, including arrangements for segregation, storage, containment and timely removal of wastes arising from future shutdown activities. The response should also identify the nature, source, quantity and intended management route of the waste observed during the inspection.

The inspection then focused on secondary containment arrangements across the site in conjunction with permit condition 3.2.3, this included the Cement Briquette Plant, the tank farm and the line 3 tank storage area. Due to time constraints, the containment audit will continue on the next site visit, scheduled for November 2026.

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.