

Compliance Assessment Report CAR_NRW0040018

Permit being assessed: RP3295FS.

For: G D Environmental Services Ltd, held by G D Environmental Services Ltd

At: East Bank Road, Felnex Industrial Estate, Newport, Gwent, NP19 4PP.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 08/06/2022 between 13:15 and 14:00.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Chris Burge.

Report sent to: Mark Williams, Technically Competent Manager on 14/06/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Action only (X)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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

Total number of 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
B1	Ensure all areas of weakened / exposed flooring infrastructure is repaired to prevent any potential risk of contaminants leeching to groundwater and inform NRW Officers of work(s) completed	31/08/2022
C1	Mr. WILLIAMS to send recent WAMITAB Qualification Certificate to NRW to update site / permit records	Already completed
C2	Provide a current FPMP (Fire Prevention and Mitigation Plan) for GD Environmental, Newport that complies with current NRW FPMP guidance which can be found on NRW's external website.	31/08/2022
F3	Install additional netting and / or excluder on access gates on site to prevent further escaping of any windblown debris and continue with daily litter checks to remove any excess windblown debris as per agreement on site	31/08/2022

Action 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

This report details the site visit made on the 8th June 2022 to GD Environmental, permit reference number EPR-RP3295FS. NRW Officers Greg GARDNER and Chris BURGE along with Carla CURTIS attended the GD Environmental site at Unit 11, East Bank Road, Newport, NP19 4PP for a routine site inspection at 13:15pm where we met with Mark WILLIAMS (Site Manager and TCM) along with Paul HENDICKSON (Site Supervisor). The weather was dry, bright, windy and reasonably warm which it had also been the previous day.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property

- 4 – A non-compliance which has no potential environmental effect

PERMIT HISTORY

See below extract from permit regarding variation history.

Status log of the permit

Description	Date	Comments
Permit determined EAWML 30387	19/09/06	Original licence issued to GD Environmental Services Ltd.
Variation determined EPR/RP3295FS/V002 formerly EAWML 30387	01/05/13	Variation to add waste code 10 01 03
Variation determined EPR/RP3295FS/V003	03/07/13	Variation to increase annual throughput to 74,999 and increase the permitted boundary
Variation determined EPR/RP3295FS/V004	14/06/16	Varied permit with increased boundary issued to GD Environmental Services Ltd.
Application EPR/RP3295FS/V005 (variation and consolidation)	Duly made 13/07/21	Application to add waste codes 19 08 01, 19 08 02, 19 09 01 and 20 03 06, and update the permit to modern conditions
Additional information received	14/09/21	Consisting of: • Updated Environmental Management System (Felnex/WTS/EMS/2.0)
Additional information received	05/10/21	Confirmation of activities undertaken on Waste electrical and electronic equipment (WEEE), and battery and accumulator waste streams.
Variation determined EPR/RP3295FS	20/10/21	Varied and consolidated permit issued to G.D Environmental Services Limited.

End of introductory note

ACTIONS FROM PREVIOUS SITE INSPECTION - 01/12/20

ACTION: Provide information on what the contingency plans for site are if waste streams, the GD Environmental supply to, are closed down for prolonged periods of time.

COMPLETE: Sent via email to NRW Officers following site inspection on 01/12/20

ACTION: Provide a current FPMP (Fire Prevention and Mitigation Plan) for GD Environmental, Newport that complies with current NRW FPMP guidance which can

be found on NRW's external website.

ONGOING: Site has been chased to submit the latest FPMP due to permit variation on 20/10/21 and have advised NRW that it will be completed / submitted by 31/08/22

ACTION: Provide action plan for infrastructure repair work for concrete flooring on site following the issue of this CAR form.

COMPLETE: Site are consistently repairing various parts of concrete flooring which was evident on 08/06/22 site inspection

ACTION: Provide up to date / most recent EMS (Environmental Management System) to NRW officers following the issue of this CAR form.

COMPLETE: Most recent EMS is located on NRW Systems

ACTION: Ensure all waste stockpiles are no more than 4 metres high following the issue of this CAR form.

COMPLETE: Following site inspection on 08/06/22 all stockpiles of waste were below 4 metres high twinned with no complaints received to NRW over excessive stockpile heights

ACTION: Please send an copy of your WAMITAB certificate to NRW officers following the issue of this CAR form.

COMPLETE: Most recent copy of WAMITAB certificate has been submitted to NRW Officers

ACTION: Please ensure all recent / up to date waste return data is submitted to NRW by the specified deadlines as indicated in the above table.

COMPLETE: All waste return data has been submitted to NRW on time and in full

GENERAL OBSERVATIONS

GD Environmental operate under a Tier 2 Bespoke environmental permit based on standard rule set SR2010_No12. This site is used as a waste transfer station with treatment prior waste being distributed to other companies / sites within the UK. The site was in operation at the time of the visit with numerous lorries / heavy machinery carrying out waste operation activities. No waste of any type was stored outside of the permit boundary apart from empty metal skips. There were numerous stockpiles of waste stored in various segregated bays as well as underneath a corrugated roof outbuilding. There was a pest / scavenger deterrent system in operation at the time of inspection which seemed to have a positive effect in keeping pest / scavengers at bay.

WASTE ACTIVITIES

NRW Officers witnessed various different waste streams that were segregated and ready for transfer to other sites for further processing. The stockpile heights of these waste streams were not excessive especially underneath the electrical pylon area which was a cause for concern on the previous site inspection. This was good to see from the operator that they were taking actions to prevent excessive stockpile heights to prevent any potential fire risk (see photo 1).



Photo 1 - Waste stockpile heights at GD Environmental

The housekeeping on site was in good order with all waste stockpiles located within designated storage bays with no overlapping present and also access on site was not restricted for any vehicles. It was noted by NRW Officers that due to the particularly high winds experienced during the site inspection, some of the loose debris was getting windblown and caught on the on site security fencing with some loose debris evident outside of the permit boundary. Mr. HENDRICKSON assured NRW Officers that daily litter checks are conducted by on site staff to remove excess windblown debris. NRW Officers advised Mr. WILLIAMS and Mr. HENDRICKSON that it would be beneficial to add some stronger netting and / or excluder on the access gate to prevent any windblown debris from escaping off site underneath the access gate (see photo 2).



Photo 2 - Some windblown debris located at GD Environmental

ACTION: Install additional netting and / or excluder on access gates on site to prevent further escaping of any windblown debris and continue with daily litter checks to remove any excess windblown debris as per agreement on site

ONGOING: Site have procedure in place to undertake daily litter checks of excess windblown debris

STAFF COMPETENCY

Mr. WILLIAMS indicated to NRW Officers that he will now become the TCM (Technically Competent Manager) designated for this site. NRW Officers requested that Mr. WILLIAMS WAMITAB (Waste Management Industry Training and Advisory Board) certificate needs to be submitted to NRW to update our records.

ACTION: Mr. WILLIAMS to send recent WAMITAB Qualification Certificate to NRW to update site / permit records

COMPLETE: NRW Officers have received Mr. WILLIAMS WAMITAB Qualification Certificate, via email, on 09/06/22

DRAINAGE AND INFRASTRUCTURE

During the time of the inspection it was noted to NRW officers that GD Environmental have an interceptor drainage system that is currently operational with no issues and is checked / maintained on an ad-hoc basis (typically every 6 months). When cleaned, the discharge travels to a foul sewer. There was no excess oils / loss of containment of liquids during the site inspection and there were no concerns regarding the on site drainage system during the site inspection

The flooring infrastructure on the site was generally in good condition and an improvement on the previous inspection. There were a couple of exceptions where this could be maintained or even improved due to the concrete cracking which poses a potential risk of contaminants leeching to ground (see photo 3). Mr. HENDRICKSON indicated to NRW Officers that sections of the flooring on site that required repairing were being cut ready to be maintained / improved and the site undertake this repair work on a regular basis which is a proactive action currently being undertaken by the site.



Photo 3 - Areas of flooring infrastructure requiring maintenance / improvement

ACTION: Ensure all areas of weakened / exposed flooring infrastructure is repaired to prevent any potential risk of contaminants leeching to groundwater and inform NRW Officers of work(s) completed

ONGOING: Evidence on site of areas to be maintained witnessed by NRW Officers. Further infrastructure repair works to be completed.

WASTE RETURNS

GD Environmental, Newport are up to date with their submitted waste return data which has been submitted on time and in full. For the latest quarter (Jan-Mar) of 2022 the site have indicated that they accepted a total of 9,569.33 tonnes of waste material and have removed 10,567.27 tonnes of waste material. No unauthorised wastes have been accepted to this site. Just as a reminder to the site of the quarterly waste return submission deadlines (table below).

Waste Return Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

NRW officers Greg GARDNER and Chris BURGE along with Carla CURTIS left site at 14:00pm.

I look forward to working with the site in future.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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 only relating to the activity assessment
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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.