

## Compliance Assessment Report CAR\_NRW0040549

**Permit being assessed:** QB3093HE.

For: Alexandra Docks, held by South West Wood Products Limited

At: East Way Road, Newport, NP20 2NP.

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

On 13/10/2022 between 10:00 and 11:00.

Parts of permit assessed: Various

**NRW Lead Officer:** Greg Gardner, accompanied by Carla Curtis.

**Report sent to:** Ms. Rita Vassallo, Technically Competent Manager on 18/10/2022.

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

| Part of permitted activity assessed (criteria)   | Assessment result | Permit condition |
|--|-------------------|------------------|
| C4 - General Management - Storage, handling labelling and Segregation  | Action only (X)   |                  |
| A1 - Specified by permit   | Assessed (A)      |                  |
| B3 - Infrastructure - Site drainage engineering (clean and foul)   | Assessed (A)      |                  |
| B5 - Infrastructure - Plant and equipment  | Assessed (A)      |                  |
| C1 - General Management - Staff competency/training  | Assessed (A)      |                  |
| F1 - Amenity - Odour   | Assessed (A)      |                  |
| F2 - Amenity - Noise   | Assessed (A)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter   | 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       |
|----------|--|-------------------|
| C4       | Ensure stockpiles of wood (both processed and unprocessed) are in line with your sites FPMP document with regards to the maximum stockpile height of 4 metres. | Already completed |

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 13th March 2022 to South West Wood Products, Newport, permit reference number EPR-QB3093HE.

NRW Officers Greg GARDNER and Carla CURTIS attended the South West Wood Products site at Alexandra Docks, East Way Road, Newport, NP20 2NP for a routine site inspection at 10:00am where we met with Ms. Rita VASSALLO (Technically Competent Manager), Mr. Martin CHUBB (Operations Manager) and Mr. Christopher CHENEY (Site Manager). The weather was dry and reasonably mild which it had 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 BREACHES / ACTIONS

#### ACTION ONLY – PERMIT CONDITION 3.5.1

##### (C4) - STORAGE, HANDLING, LABELLING AND SEGREGATION

*"The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance "*

- SWWP Ltd stockpiles of wood (both processed / unprocessed) were in exceedance of the sites FPMP document with regards to maximum storage height of 4 metres however reduction of said stockpiles was actioned on site during inspection

Please see report content for further justification

**PERMIT HISTORY**

See below extract from permit regarding variation history.

| <b>Status log of the permit</b>                 |                         |   |
|---|-------------------------|---|
| <b>Description</b>                              | <b>Date</b>             | <b>Comments</b>   |
| Permit issued<br>EPR/PB3333DH<br>(EAWML 400181) | 17/10/13                | Tier 3 bespoke permit for a waste transfer station for the storage and bulking up of wood waste for onward transport issued to Bowergy B V.     |
| Variation determined<br>EPR/PB3333DH/V002       | 15/10/14                | Varied permit to include storage of RDF and increase the throughput to 140,000 tonnes a year.   |
| Transfer determined<br>EPR/QB3093HE/T001        | 05/03/15                | Full transfer of permit to South Wales Wood Recycling Limited complete.   |
| Variation determined<br>EPR/QB3093HE/V002       | 20/05/15                | Varied permit to treat waste wood for recovery prior to being transported off site issued   |
| Part Transfer determined<br>EPR/QB3093HE/T003   | 22/01/18                | Part transfer from South Wales Wood Recycling Limited to Associated British Ports issued (EPR/AB3699FY)   |
| Transfer determined<br>EPR/QB3093HE/T004        | 08/11/18                | Transfer of permit in full to South West Wood Products Limited.   |
| Variation determined<br>EPR/QB3093HE/V005       | 07/05/19                | Varied permit to increase throughput to 150,000 tonnes per annum and to add EWC codes 19 12 02 and 19 12 03<br>The permit was also consolidated |
| Application<br>EPR/QB3093HE/V006                | Duly made<br>31/05/2019 | Operator led variation to add EWC code 19 05 01.  |
| Variation determined<br>EPR/AB1234CD            | 02/07/2019              | Varied permit issued.   |

**GENERAL OBSERVATIONS**

South West Wood Products, Newport operate under a Tier 3 Bespoke environmental permit for the storage and treatment of waste wood prior to recovery, and the storage of baled Refuse Derived Fuel (RDF). The treatment operations are limited to manual sorting, bulking up, shredding, chipping, and screening of wood and metal waste. No treatment of the baled RDF is permitted other than bulking up for onward transport and all treatment is for recovery only. The maximum quantity of waste accepted and processed on this site shall not exceed 150,000 tonnes per year. The site was operational at the time of the site inspection. South West Wood Products intend to move to a newer, larger site located at Newport Docks (Coal Terminal) at some point in the near future and surrender the permit (EPR-QB3093HE) for this current site location.

**SITE INFRASTRUCTURE**

The general housekeeping on the site was in good condition with no major amounts of loose debris located on the floor (as seen in photo 1). South West Wood Products have an on site dust suppression system to reduce the amount of dust / fines in the atmosphere by using a tractor with an attached water bowser as well as street sweeper (as seen in photos 2 and 3). This would be undertaken regularly to reduce the excess wood dust / fines in the atmosphere and was witnessed by NRW Officers at the time of the site inspection.

A second water bowser to improve dust mitigation has been purchased along with misting cannons to minimise airborne dust (as seen in photo 4). A demonstration was undertaken

for NRW Officers to witness the fire fighting techniques on site should a fire occur. Please note that this demonstration was conducted on a stockpile of unprocessed material that was **NOT** on fire. The flooring was also in good condition with no apparent damage / defects as well as the interceptor drainage system which was again, operational with no apparent issues.



**Photo 1** - General housekeeping on site was of a good standard



**Photo 2** - On site road sweeper in constant use to minimise road deposits



**Photo 3** - On site water bowser for dust suppression and fire fighting purposes



**Photo 4** - Mist cannon to help minimise the presence of airborne dust

### **WASTE ACTIVITIES - WOOD WASTE**

During the site visit it was noted that the wood stockpile sizes were in exceedance of the sites designated Fire Prevention Mitigation Plan (FPMP) document as seen in photo 5. The height sizes, although close to the 4 metre recommended maximum height dictated by the sites FPMP document, are constantly changing due to fluid turnaround of material on site.

The majority of this woodchip that is stored on site is processed, via a large industrial shredder, to make it into smaller / finer items. This is then ready for transportation to other sites for further processing and / or recovery with the majority of material ending up as fuel for the Margam Green Energy Plant. The wood waste is tested on site in a laboratory for sizing and moisture content to ensure the correct grading category can be applied before despatching to the end user which Mr. CHUBB duly explained to NRW Officers.



**Photo 5** - Wood stockpile in exceedance of sites FPMP document



**Photo 6** - Wood stockpile being brought back into compliance of sites FPMP document

Whilst on site, and following discussion regarding exceeding of wood stockpile heights, Mr. CHUBB duly requested on site heavy machinery to attend certain areas of site to reduce wood stockpile heights back in to compliance with the sites FPMP document. This was duly witnessed and evidenced by NRW Officers during the site inspection and appreciate the prompt proactiveness by on site management.

As a reminder to site management, always ensure wood stockpile heights (both processed and unprocessed) remain in compliance with your sites FPMP documents with regards to stockpile sizes.

**ACTION:** Ensure stockpiles of wood (both processed and unprocessed) are in line with your sites FPMP document with regards to the maximum stockpile height of 4 metres.

**COMPLETE:** Site duly reduced wood stockpile heights which was witnessed by NRW Officers during site inspection. Further evidence (photographic) was submitted by Ms.

**VASSALLO to NRW Officers via email on 13/10/22.**

**STAFF COMPETENCY / TRAINING**

Ms. Rita VASSALLO has been designated the new TCM (Technically Competent Manager) for the two SWWP Ltd site within the South East Area. Ms. VASSALLO completed her WAMITAB (Waste Management Industry Training and Advisory Board) certificate on 03/03/20. Please ensure you keep up to date with your continuing competence to ensure compliance with your permit conditions.

**WASTE RETURN SUBMISSIONS**

South West Wood Products have submitted all of their quarterly waste returns for 2022 on time and in full. They declared, as a total for 2022 so far, 79,123.41 tonnes of waste was received and 87,847.71 tonnes of waste was removed which is within their permitted allowance. There were no unauthorised waste streams identified within the submitted returns.

NRW Officers Greg GARDNER and Carla CURTIS left site at 11.00am the same day.

If you have any issues with this report please contact Greg Gardner on [greg.gardner@naturalresourceswales.gov.uk](mailto:greg.gardner@naturalresourceswales.gov.uk)

I look forward to working with the site in the future.

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](mailto: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](mailto: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.