

## Compliance Assessment Report CAR\_NRW0040734

**Permit being assessed:** BB3796FA.

For: The Scrapyard, held by Airfield Metals Limited

At: Carew Airfield, Tenby, SA70 8SX.

**Type of assessment carried out:** Report/Data Review, Reason: Other.

On 21/11/2022 between 11:00 and 11:45.

Parts of permit assessed: FPMP Review

**NRW Lead Officer:** Sally Wakeford.

**Report sent to:** Nening Jones, Director on 25/11/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	

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
C2	Update FPMP in line with guidance on water supply	31/12/2022

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

Following submission of the submitted Fire Prevention and Mitigation Plan for Airfield Metals Ltd – The Scrapyard, document reference FPMP\_Airfield Metals\_Top yard\_v3 submitted in October 2022, the document has been reviewed by NRW and Mid & West

Wales FRS.

Please find a summary of the review below. Guidance contains “must haves” and “should haves” for the FPMP, these are indicated in the comment’s column.

### FPMP Checklist summary

Section	Compliant with guidance? Yes / No / N/A	Date of plan / revised plan	Comments
5. FPMP Summary	Y	Oct 2022	<b>(must)</b> All “musts” covered
5. Site Plan	Y	Oct 2022 v3	<b>(must)</b> All “musts” covered
6. Common Causes of Fires and Preventative Measures	Y	Oct 2022	<b>(must)</b> All musts covered
7. Storage Times and self-combustion factors	Y	Oct 2022	<b>(must)</b> All “musts” covered. <b>(should)</b> not covered.
8. Managing Waste Material Stacks and Separation Distances	Y	Oct 2022	<b>(must)</b> All musts covered
10. Baled Waste Storage	Y	Oct 2022 v3	<b>(must)</b> All musts covered
11. Enclosing Stacks Using Bays and Walls	n/a	Oct 2022	
12. Waste Stored Within a Building	Y	Oct 2022	<b>(should)</b> You should seek advice from your insurer to ensure that you have met any requirements for fire detection and fire suppression.
13. Waste Stored in Containers	Y	Oct 2022	<b>(must)</b> All musts covered  <b>(should)</b> No mention of ability to easily move the containers.
14. Layout of Waste Stacks on your Site	Y	Oct 2022	<b>(may need to)</b>

15. Seasonality and Waste Stack Management	n/a	Oct 2022	<b>(should)</b>
16. Monitoring and Turning of Stacks	n/a	Oct 2022	<b>(should)</b> no monitoring for hotspots using temp probes.
17. Fire Detection	Y	Oct 2022	<b>(should)</b> no comments
18. Fire Suppression Systems			
19. Firefighting Strategy	Y	Oct 2022	<b>(Guidance does not state whether they must have these or need to consider these)</b>
20. Water Supplies	N	Oct 2022 v3	Hydrants use. See comments below.
21. Managing Water Run-off	Y	Oct 2022 v3	<b>(Must take all reasonably practicable steps):</b>
22. Designated Quarantine Area	Y	Oct 2022	<b>(Shoulds):</b> Area not noted for separation distance.
23. During and After an Incident	Y	Oct 2022 v3	<b>(Musts):</b> All musts covered
24. Reviewing and Monitoring your Fire Prevention & Mitigation Plan	Y	Oct 2022 v3	<b>(Musts):</b> All musts covered

Following a site visit by Sally Wakeford (NRW) and Simon Pearson (M&WWFRS) on 21 November 2022, FRS provided the following comments regarding the use of hydrants.

*“As stated in Section 12 of their FPMP, the quantity of water required is based on the largest stack size being 256m<sup>3</sup>. This would require a total water requirements of 307m<sup>3</sup> which equates to approx. 1700 litres / min.*

*The hydrant that is available in the field nearby is a 110mm main with a normal flow rate of anywhere between 700 – 1000 l/min therefore within 3 hours the hydrant could provide in between 126,000 to 180,000 litres. This would be insufficient for the stack size stated above.*

*Using the IBC containers is a good first strike option however it would not sustain a large*

*fire involving the full stack, therefore one possible solution would be for the operator to reduce the stack size with the recommended separation distance thus reducing the water requirements.*

*Another option would be for the operator to store the extra water required on site in a suitable container where the FRS can gain access to supplement the water supply from the hydrant.”*

Please note that all sections, apart from water supplies, have included all the “must” requirements in the guidance.

If you have any further questions, please don’t hesitate to contact Sally Wakeford.

Thank you for your time on site.

**END**

**Any compliance criteria not highlighted in the above summary should be considered as not assessed.**

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

**You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1<sup>st</sup> April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.**

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.