

Compliance Assessment Report CAR_NRW0040753

Permit being assessed: CB3491HU.

For: Englobe Wastewater Treatment Plant Glan Llyn St Modwen Development Site, held by Englobe Regeneration UK Limited

At: Queen's Way, Llanwern, Newport, Newport, NP19 4TZ.

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

On 01/12/2022 between 13:00 and 14:00.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner.

Report sent to: Mr. Jack Thomas, Site Manager on 12/12/2022.

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)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	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?

No action required.

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 1 December 2022 to Englobe Wastewater Treatment Plant, Llanwern permit reference number EPR-CB3491HU.

Natural Resources Wales (NRW) Officer Greg GARDNER attended the Englobe Wastewater Treatment Plant Glan Llyn St Modwen Development Site, Queensway, Llanwern, Newport, NP19 4TZ for a first site inspection at 13:00pm where I met with Mr. Jack THOMAS (Technical & Engineering Manager). The weather was dry, foggy and reasonably cold which it had also been the previous day. Mr. THOMAS was very cooperative and hospitable during the site inspection and provided an onsite safety induction for Officer GARDNER which pointed out key safety information should an emergency occur.

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 extract from EPR-FP3995FM regarding permit history.

Status log of the permit

Description	Date	Comments
Application EPR/CB3491HU/A001	Duly made 24/01/22	Application for ground and surface water treatment facility made by Celtic Technologies Limited. Company name changed to Englobe Regeneration UK Limited on 04/01/2022.
Additional information	11/02/22	Confirmation of site name and technically competent manager contact details.
Additional information	15/02/22	Consisting of updated site plan.
Permit determined EPR/CB3491HU	02/03/22	Permit issued to Englobe Regeneration UK Limited

Other permits relating to this permit

Operator	Permit number	Date of issue	Link
Tata Steel UK Limited	EPR/BS3905IP	18/03/2004	Discharge from EPR/CB3491HU is further treated and discharged under EPR/BS3905IP.

COMPLIANCE BREACHES

There are no outstanding actions or identified compliance breaches following this site visit.

GENERAL OBSERVATIONS

Englobe Wastewater Treatment Plant Glan Llyn operate under a Tier 3 bespoke permit for a ground and surface water treatment facility to undertake water treatment works within the former Llanwern steelworks, which is currently undergoing development works. Groundwater which arises from remediation of land undertaken by third parties within the wider development is pumped into the network of surface water ditches. The liquid that is treated is a mixture of groundwater and surface water. No external or off-site waste is imported or treated at the plant. Treatment operations are limited to manual and/or mechanical for the purpose of recovery only.

The contaminated water is pumped from a pre-treatment lagoon (controlled by a third party), through the permitted waste treatment facility, prior to discharge via private sewer to the Tata Steel UK Limited's permit EPR/BS3905IP for further treatment before being ultimately discharged to the Severn Estuary. Permitted waste types are limited to contaminated surface and ground water only. The maximum quantity of waste accepted and processed on site shall not exceed 341,640 tonnes per year. The burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

FIRST SITE INSPECTION

The purpose of this site visit was for an NRW regulatory officer to undertake a first site inspection of the newly permitted waste operation as well as discuss certain topics with the operator to ensure continued constant compliance with the sites environmental permit.

The topics discussed as part of the initial site inspection in further detail included:

- How to comply with your environmental permit
- Purpose of an Environmental Management System (EMS)

- Technical competence such as obtaining a WAMITAB certificate
- Frequency and details of waste return submissions
- How compliance scoring affects subsistence fees
- What documents are held on the public register
- The site / operators waste duty of care
- Hazardous waste requirements
- Site infrastructure and maintenance requirements
- Purpose of a Fire Prevention & Mitigation Plan (FPMP)

Mr. THOMAS provided a detailed overview to Officer GARDNER of the process of treating the contaminated water. Contaminated water from the old Llanwern Steelworks site is pumped from a lagoon to the Englobe Treatment Plant. When the water arrives on site, it is passed through a series of sieves and filters to remove sediment, treated with chemicals to alter the pH content to as neutral as possible and then discharged to a private foul sewer at Tata Steel. Photo 1 shows the various tanks where the water is filtered to remove contaminants.



Photo 1 - Englobe filter tanks for contaminated water

Mr. THOMAS indicated that in the unlikely event that there is a loss of containment of all liquids contained on site, there is a concrete bunded wall along the perimeter of the site which can hold all the stored liquid with a 10% excess threshold. Following prolonged heavy rainfall, the site has a rainwater pump to remove the pooling of water. This water is pumped back to the lagoon. Photo 2 shows the concrete bunded wall (in black) at the bottom left foreground. The integrity of the bunded wall is checked regularly via visual inspection as well as a flooding the area with a small amount of clean water to identify any potential integrity breaches.



Photo 2 - Concrete bunded wall (bottom left foreground in black)

During the site inspection the housekeeping was kept to a very good standard with no evidence of any loose debris / equipment located on the floor. Storage of materials were kept within designated areas that were identified with various safety labels and securely locked. The integrity of the water tanks was in good condition with good maintenance upkeep. There were no offensive odours or excessive noises identified during the site inspection with no presence of any scavengers (birds / rodents) witnessed. Site security was to a good standard with the presences of secure anti-climb fencing located around the perimeter as well as on site security cameras with 360-degree vision and floodlighting.



Photo 3 - Security cameras with 360-degree vision and floodlighting

Following the onsite inspection, Mr. THOMAS and Officer GARDNER ventured to the onsite office where we discussed the various first site inspection topics (bullet points above). Mr. THOMAS provided Officer GARDNER with all required documentation and understood the various different requirements in order to comply with the sites environmental permit. Mr. THOMAS identified that Mr. Gavin RODWAY is the TCM (Technically Competent Manager) for the site. A copy of Mr. RODWAY WAMITAB (Waste Management Industry Training and Advisory Board) certificate has been provided for NRW records. Following this discussion,

Mr. THOMAS duly signed the checklist sheet provided.

WASTE RETURN SUBMISSIONS

Englobe Wastewater Treatment Plant, Llanwern have submitted their waste return data for permit, EPR-CB3491HU, on time and in full. To date (2022), the site has received 44,777 tonnes of waste(s) and removed 44,777 tonnes of waste(s). There are no unauthorised wastes that have been accepted on site and are within the annual permitted allowance for the amount of waste to be accepted on site (341,640 tonnes).

As a reminder to the operator, please see below the waste return submission deadlines. A waste return must still be submitted even if it is a null return:

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

The site produces hazardous waste from the wastewater treatment operations. Due to this, hazardous waste consignment notes are required, for each quarter (as above), for any hazardous waste that has been received, removed or disposed at a site. They are a compulsory requirement of the Hazardous Waste Regulations 2005. A hazardous waste return must still be submitted to NRW even if it is a null return (as above). Further information can be found on the below links:

Submit your hazardous waste return -> [Natural Resources Wales / Submit your hazardous waste return](#)

How to complete a hazardous waste consignment note -> [Natural Resources Wales / How to complete a hazardous waste consignment note](#)

No breaches have been identified with regards to this permit, EPR-CB3491HU.

NRW Officer Greg GARDNER left site at 14.00pm the same day.

If you have any issues with this report, please contact Greg Gardner on 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 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.