

## Compliance Assessment Report CAR\_NRW0041546

**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 15/03/2023 between 10:00 and 10:30.

Parts of permit assessed: Various

**NRW Lead Officer:** Greg Gardner.

**Report sent to:** Mr. Mark Williams, Technically Competent Manager on 22/03/2023.

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

| Part of permitted activity assessed (criteria)                                                                 | Assessment result | Permit condition |
|----------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| B3 - Infrastructure - Site drainage engineering (clean and foul)                                               | C3 Minor          | 2.1.1            |
| A1 - Specified by permit                                                                                       | 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)      |                  |
| 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)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter                                                             | 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 |
|------------------------------------------|----------------------------|
| 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 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| B3       | 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 | 30/06/2023  |

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.

### **You are non-compliant with your permit.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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 15th March 2023 to GD Environmental, permit reference number EPR-RP3295FS. NRW Officer Greg GARDNER attended, unannounced, to the GD Environmental site at Unit 11, East Bank Road, Newport, NP19 4PP for a routine site inspection at 10:00am where I met with Mr. Paul HENDRICKSON (Site Supervisor). The weather was dry, overcast and reasonably mild which it had also been the previous day. The site was accommodating and cooperative during the site inspection.

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<br>EAWML 30387                                     | 19/09/06              | Original licence issued to GD Environmental Services Ltd.                                                                             |
| Variation determined<br>EPR/RP3295FS/V002<br>formerly<br>EAWML 30387 | 01/05/13              | Variation to add waste code 10 01 03                                                                                                  |
| Variation determined<br>EPR/RP3295FS/V003                            | 03/07/13              | Variation to increase annual throughput to 74,999 and increase the permitted boundary                                                 |
| Variation determined<br>EPR/RP3295FS/V004                            | 14/06/16              | Varied permit with increased boundary issued to GD Environmental Services Ltd.                                                        |
| Application<br>EPR/RP3295FS/V005<br>(variation and consolidation)    | Duly made<br>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: <ul style="list-style-type: none"> <li>Updated Environmental Management System (Felnex/WTS/EMS/2.0)</li> </ul>         |
| 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<br>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(S) - CAR\_NRW0040018 on 08/06/22**

| Date     | Action                                                                                                                                                                                        | Completed (Y/N) | Action Taken                                                                                                        |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------|
| 08/06/22 | 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 | Yes             | Mr. WILLIAMS has sent images of work being carried out on identified areas of exposed flooring from site inspection |
| 08/06/22 | Mr. WILLIAMS to send recent WAMITAB Qualification Certificate to NRW to update site / permit records                                                                                          | Yes             | Mr. WILLIAMS has sent his WAMITAB Qualification Certificate to NRW Officers following                               |

|          |                                                                                                                                                                                                                                 |     |                                                                                                                                      |  |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------|--|
|          |                                                                                                                                                                                                                                 |     | the site inspection                                                                                                                  |  |
| 08/06/22 | 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                                            | Yes | Mr. WILLIAMS has duly sent NRW a copy of the sites FPMP for review via email on 23/08/22                                             |  |
| 08/06/22 | 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 . | Yes | Site have installed rubber mesh / excluder on rear access gates with email evidence provided to NRW Officer Greg Gardner on 29/06/22 |  |

### PERMIT BREACHES

Below are permit breaches that were identified during the site inspection.

#### **CATEGORY 3 BREACH – PERMIT CONDITION 2.1.1**

##### **(B3) - SITE DRAINAGE ENGINEERING (CLEAN AND FOUL)**

*"The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities")."*

*"All non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage "*

- Areas of weakened impermeable surface present with exposed flooring infrastructure
- Failure to improve flooring may result in potential risk of contaminants leeching to groundwater resulting in an environmental issue

Please see report content for further justification

### 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

Whilst conducting the site inspection with Mr. HENDRICKSON, NRW Officer GARDNER witnessed various different waste streams that were segregated and ready for transfer to other sites for further processing. Mr. HENDRICKSON indicated that unprocessed wood waste(s) are taken to South West Wood Products products with plastics are baled and

transported to Siteserv. General waste, where possible is sorted and recycled however where not possible it is sent to landfill with trommel fines taken to Caerphilly Skip Hire Ltd. Scrap metal is sorted then transported off site to various scrap metal dealers dependant on current pricings / market values.

The stockpile heights of these waste streams were not excessive of the sites Fire Prevention Mitigation Plan (FPMP) especially underneath the electrical pylon area which has been a cause for concern on the previous site inspections. 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). Stockpile sizes on site are constantly dynamic therefore, as a reminder to the operator, please ensure you continue to remain within waste stockpile height / width limits as identified in your site FPMP to prevent potential fire risks.



**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. Following the previous site inspection (CAR\_NRW0040018) 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. This has now been rectified with netting / excluder added to the access gates (see photo 2). There were no offensive waste odours or excessive noises noted by NRW Officer GARDNER during the site inspection.



**Photo 2** - Newly installed excluder on access gate at GD Environmental, Newport

### **STAFF COMPETENCY**

Mr. WILLIAMS is the designated Technically Competent Manager (TCM) for the site. Mr. WILLIAMS has submitted his most recent WAMITAB certificate to NRW for our records with an issue date of 10/02/22.

### **DRAINAGE AND INFRASTRUCTURE**

During the time of the inspection it was noted that there was a large pooling of water at the north end vehicle entry area of the site due to a blocked drain following the recent poor weather conditions. Mr. HENDRICKSON indicated that a contractor was attending GD Environmental that day to ensure the drainage was cleared. When operating correctly the water is cleaned and the discharge travels to a foul sewer. Please note that there were no excess oils / loss of containment of liquids during the site inspection and there were no concerns regarding any liquids leaving site due to the blocked drain in this area.



**Photo 3** - Area of pooled water due to blocked drain at GD Environmental

The flooring infrastructure on the site was generally in good condition and the areas identified for repair work during the previous inspection (CAR\_NRW0040018) have been completed however, during this site inspection it was noted that some newer areas of the flooring infrastructure in high traffic areas were in need of repair (see photos 4-6). There is potential, should these weakened areas become worse through poor weather conditions and / or continued wear and tear through on site operations, for risk of on site contaminants leeching to groundwater causing an environmental issue. Mr. HENDRICKSON on site and Mr. WILLIAMS (TCM), via email were informed that this would be a Category 3 breach of the sites environmental permit.

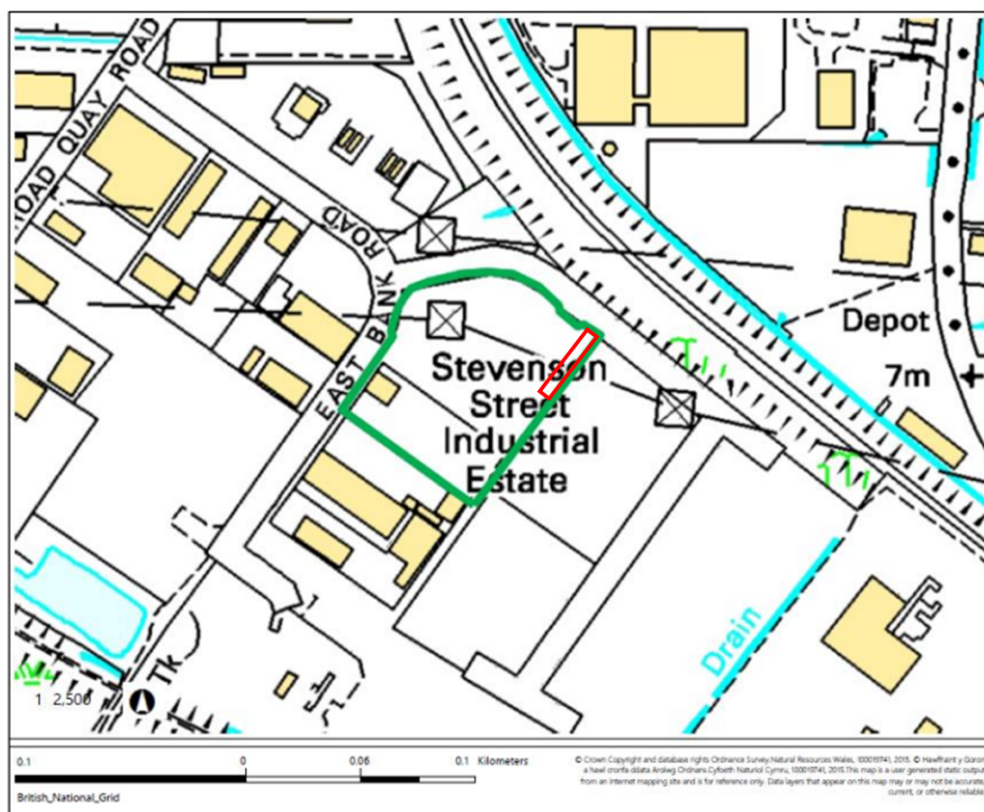


**Photo 4** - Weakened areas of concrete flooring at GD Environmental

**Photo****5 - Weakened areas of concrete flooring at GD Environmental****Photo 6 - Weakened areas of concrete flooring at GD Environmental**

Mr. HENDRICKSON indicated to Officer GARDNER that the site intend on building a wall at the north end of the site (see photo 7 below) at some point in the spring / summer of 2023. Mr. HENDRICKSON also indicated that repair works to the identified weakened areas of flooring would also be completed at the same time.

### Schedule 7 - Site plan



Proposed New Wall

Permit Boundary

Photo 7 - GD Environmental site boundary in **Green** and proposed new wall in **Red**

### WASTE RETURNS

GD Environmental, Newport are up to date with their submitted waste return data which has been submitted on time and in full. Please see table below for waste(s) received and removed from site for 2022.

|              | Waste(s) Received (Tonnes) | Waste(s) Removed (Tonnes) |
|--------------|----------------------------|---------------------------|
| Quarter 1    | 9,569.33                   | 10,567.27                 |
| Quarter 2    | 8,546.97                   | 8,844.81                  |
| Quarter 3    | 8,587.73                   | 8,244.58                  |
| Quarter 4    | 9,300.86                   | 9,577.58                  |
| <b>Total</b> | <b>36,004.89</b>           | <b>37,234.24</b>          |

No unauthorised wastes have been accepted and the site are within their maximum permitted allowance of 74,999 tonnes for waste(s) to be accepted and processed. 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 officer Greg GARDNER left site at 10:30am.

**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](mailto: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](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.