

Compliance Assessment Report CAR_NRW0041896

Permit being assessed: BB3793ND.

For: Nevills Dock, held by AMG Resources Ltd.

At: A M G Resources Ltd, Nevills Dock, Llanelli, Carmarthenshire, SA15 2HD.

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

On 18/05/2023 between 11:00 and 12:30.

Parts of permit assessed: A, C, F

NRW Lead Officer: David Morgan.

Report sent to: Adrian Stewart, Technical Competent Manager on 31/05/2023.

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)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	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

A routine site inspection was undertaken on Thursday 18th May 2023. The purpose of the

inspection was to assess compliance with the Pest Management Plan (PMP), which was formally accepted by Natural Resources Wales on 11th May 2023 (ref: CAR_NRW0041817).

As mentioned in the previous Compliance Assessment Report (ref: CAR_NRW0041817), although the recently submitted PMP did not meet every definition of an Appropriate Measure as stated in guidance, it was deemed by Natural Resources Wales, that currently, the PMP contains suitable measures for the mitigation of pests, namely flies, arising from the site's operations. This is supported by the decrease in reports and significant investment and improvement by AMG Resources in managing this aspect of the operation.

At the time of the inspection on Thursday 18th May, present on site during the inspection were: David Morgan (Natural Resources Wales) and Peter Nichols (AMG Resources).

An inspection of the site was conducted and the following observations were made:

Waste Storage, Processing and Acceptance

It was noted during the inspection that the storage and treatment process on site has altered in recent months. Waste bales are now accepted on site, split, with residual waste (paper, packaging labelling, plastic etc.) being removed prior to waste being baled again. This process ensures AMG can produce a better quality item for reuse.

It was agreed by both the Operator and Natural Resources Wales that the residual waste that is removed in all likelihood presents the biggest risk in terms of flies on site. To mitigate this risk, this waste is removed from site on a daily basis or on alternate days. Also, we discussed the potential installation of extra fly-capture bags and additional sprays if required. Following the inspection, Waste Transfer Notes were provided that evidenced this regular removal of waste.

At the time of the inspection, when weather was dry and warm, there was a very low number of flies in this location.



During the inspection, a delivery of waste was accepted and the unloading process was witnessed. Upon delivery, the load being accepted, was free from any odour and flies.

Waste acceptance procedures, including pre-acceptance checks and fly mitigating measures (e.g. rejection of loads etc.) was discussed at length with Peter Nichols (AMG) and procedures described were as set out in the Pest Management Plan.



Generally, on site, volumes of waste have been reduced since previous inspections and at the time of the inspection, all waste was stored on impermeable surface within the permitted area.

Fly Monitoring

Fly monitoring boards were inspected. Monitoring pads appear to have been changed regularly. The majority of the boards showed a low level of what appeared to be fruit flies. There were little or no house flies on the boards.



Fly capture bags were installed all around the site and appear to have been installed very recently. Some capture bags had flies in but again, levels were generally low and did not suggest the presence of large numbers of flies in the area.

Summary

In summary, the most recent version of the PMP has been accepted and measures that are now in place appear to be managing flies on site. We will continue to monitor this issue as we approach the summer months. It is noted that AMG Resources has significantly increased investment and efforts in the mitigation of potential pests on site.

No non-compliances were recorded during the inspection.

Thank you for your time during the inspection.

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.