

Compliance Assessment Report CAR_NRW0041986

Permit being assessed: FP3295FN.

For: A1 Skips, held by A1 Waste Management Ltd

At: Newport Docks, Newport, Gwent, NP20 2UW.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number 2304354).

On 13/06/2023 between 11:00 and 11:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Jodie Baskerville.

Report sent to: Mr. Lee COVELL, Site Manager on 26/06/2023.

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	C3 Minor	4.3.2
E1 - Emissions - Air	C3 Minor	5.1.2

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
2	8

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	Full review of sites working plan required regarding prevention and mitigation of fires. Review requires additional preventative and control measures in the event of any potential future fires. Once completed, send to NRW regulating officer for review.	29/09/2023
E1	Breach recorded for emissions to air (smoke)	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 June 2023 to A1 Skips, Newport, permit reference number EPR-FP3295FN.

NRW (Natural Resources Wales) Waste Regulation Officer Greg GARDNER and Senior Environment Officer Jodie BASKERVILLE attended the A1 Skips site at Alexandra Docks, West Way Road, Newport, NP20 2UW following a fire incident that occurred on 09/06/23, at 11:00am where we met with the Site Manager / Owner, Mr. Lee COVELL. The weather was dry and hot which it had also been the previous day.

PERMIT BREACHES / ACTIONS

Below are the permit breaches and / or actions that were identified during the site inspection.

CATEGORY 3 BREACH – PERMIT CONDITION 4.3.2

(C2) – MANAGEMENT SYSTEMS AND OPERATING PROCEDURES

"In the event of a fire on the site, the procedures outlined in sections 16.3 to 16.6 of the working plan shall be implemented immediately"

- Control measures identified within the working plan regarding fires not sufficient to minimise risk / management of ignition sources and / or potential fires

Please see report content for further justification

CATEGORY 3 BREACH – PERMIT CONDITION 5.1.2

(E1) – EMISSIONS TO AIR

"All emissions to air from specified waste management operations on the site shall be free from visible concentrations of dust, fibres and particulates as are likely to cause pollution of the environment outside the site boundary"

- Waste fire emitted smoke to the surrounding environment for a few of hours
- Breach recorded for emissions to air

Please see report content for further justification

INCIDENT RESPONSE - 09/06/23 - WIRS 2304354

At 14:00pm on 06 June 2023, NRW were informed by the South Wales Fire and Rescue Service (SWFRS) that A1 Waste Management had reported that a waste fire was occurring within their outbuilding. This outbuilding is located within their permitted boundary for waste operations as regulated by NRW under permit EPR/FP3295FN (see image 1). This outbuilding contained various household waste types.

Following this report, at approximately 15:00pm NRW Officer Alastair KRZYZOSIAK attended site and substantiated the incident. The SWFRS were present on site and were successfully extinguishing the fire, with A1 Waste Management suitably controlling the affected waste. Discussions between the SWFRS, NRW and A1 Waste Management were unable to conclude the exact cause of the incident however indications suggest that the cause of the small fire could have been as a result of overheating of batteries and / or waste glass acting as a magnifier. There was no indication of deliberate / foul play (I.E. arson)

There is damage sustained to the outbuilding with regards to scorch marks, however no other areas of site have been affected. Due to the recent hot and dry weather conditions, surface water runoff was evaporating quickly with any excess contained on site within the sealed drainage system. Emissions to air (smoke) were kept reasonably under control due to their quick response to the fire, and the small amount of waste affected. The SWFRS left site later the same day along with NRW Officer Alastair KRZYZOSIAK leaving at approximately 15:30pm after being called to another environmental incident. See photos 1-3 of photos taken by NRW Officer Alastair KRZYZOSIAK on 09/06/23.



Photo 1 - Photo of fire incident taken by NRW Officer Alastair KRZYZOSIAK on 09/06/23



Photo 2 - Photo of fire incident taken by NRW Officer Alastair KRZYZOSIAK on 09/06/23



Photo 3 - Photo of fire incident taken by NRW Officer Alastair KRZYZOSIAK on 09/06/23

SITE ATTENDANCE - 01/11/22

NRW Waste Regulation Officer Greg GARDNER and Senior Environment Officer Jodie BASKERVILLE attended A1 Waste Management at 11:00am on 13th June 2023, for a follow up visit where we met Mr. Lee COVELL to assess the damage and impact of the small waste fire that occurred on 09/06/23. The weather was dry and hot which it had also been the previous day. Mr. COVELL was cooperative throughout the visit and explained the events that occurred prior, during, and following the extinguishing of the waste fire. Again, there was no indication of deliberate / foul play (I.E. arson).

Mr. COVELL reiterated the events that occurred on 09/06/23 which reflected the events as outlined by NRW Officer Alastair KRZYZOSIAK. Within the outbuilding, the mid to south section were affected by the fire (see photo 4). The outbuilding itself is due for repair works to ensure site operations take place more efficiently. It would be worth reminding the operator

that when these repair works take place to carefully consider installing fire fighting / detection systems.

NRW Officer Greg GARDNER outlined to Mr. COVELL that a review of the sites Fire Plan will need to be undertaken to implement further control measures regarding the prevention of potential waste fires. These further control measures could include, but are not exclusive to, turning waste(s) over regularly especially during prolonged dry and warm weather conditions and installing additional fire fighting / detection systems to alert sooner and tackle quicker any emerging fires. A full review of the sites working plan regarding fire prevention and control measures will need to be undertaken to help prevent and / or mitigate and potential future fires.

Further information and guidance on how to help prevent and mitigate fires at regulated sites can be found on this link -> [Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](https://naturalresources.wales/guidance/16-fire-prevention-and-mitigation-plan-waste-management) The information contained within this document is helpful in review of your sites working plan regarding fire management.



Photo 4 - Photo of fire incident taken by NRW Officer Greg GARDNER on 13/06/23



Photo 5 - Photo of fire incident taken by NRW Officer Greg GARDNER on 13/06/23



Photo 6 - Photo of fire incident taken by NRW Officer Greg GARDNER on 13/06/23

NRW Officers Greg GARDNER and Jodie BASKERVILLE left site at 11.30am the same day.

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