

Compliance Assessment Report CAR_NRW0042442

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 11/09/2023 between 09:30 and 10:00.

Parts of permit assessed: Various

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

Report sent to: Mr. Mark Williams, Technically Competent Manager on 25/09/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	3.6.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3 Minor	4.3.1
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	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)	
F5 - Amenity - Deposits on road	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
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
C4	Reduce height and size of stockpile of waste(s) as well provide sufficient fire break(s) to ensure compliance with your site FPMP, EMS and official FPMP guidance	27/10/2023
G4	Ensure that any breakdown that occurs on site that will result in significant effect to site operations that will ultimately result in non-compliance of your environmental permit	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 11th September 2023 to GD Environmental, permit reference number EPR-RP3295FS. NRW Officers Greg GARDNER and Jodie BASKERVILLE attended, unannounced, to the GD Environmental site at Unit 11, East Bank Road, Newport, NP19 4PP for a routine site inspection at 09:30am where we met with Mr. Paul HENDRICKSON (Site Supervisor). The weather was slightly drizzly and reasonably mild which it had also been the previous day.

ACTIONS FROM PREVIOUS SITE INSPECTION(S) - CAR_NRW0041546 on 15/03/23

Date	Action	Completed (Y/N)	Action Taken
15/03/23	Areas of impermeable surface compromised due to various 'wear and tear' conditions I.E. Vehicle movements / weather. Potential for leeching to groundwater if not repaired	Yes	Mr. WILLIAMS has sent images of work being carried out on identified areas of exposed flooring from site inspection

PERMIT BREACHES

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

CATEGORY 3 BREACH – PERMIT CONDITION 3.6.1

(C4) – STORAGE, HANDLING LABELLING AND SEGREGATION

"The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention and mitigation plan guidance."

- Stockpile of unprocessed wood and other waste(s) not being stored in

compliance with the FPMP guidance and sites FPMP document

Please see report content for further justification

CATEGORY 3 BREACH – PERMIT CONDITION 4.3.1

(G4) - REPORTING AND NOTIFICATION TO NATURAL RESOURCES WALES

"Natural Resources Wales shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;"

- GD Environmental suffered a breakdown on machine which resulted in 3 week downtime
- GD Environmental failed to notify NRW of said breakdown
- GD Environmental accepted waste(s) during this time which resulted in stockpile of waste(s) not being stored in compliance with the FPMP guidance and sites FPMP document

Please see report content for further justification

GENERAL OBSERVATIONS

Whilst conducting the site inspection with Mr. HENDRICKSON, NRW Officers witnessed various different waste streams that were segregated and ready for transfer to other sites for further processing. It was noted by NRW Officers that the stockpile height of unprocessed wood was in excess of the sites Fire Prevention Mitigation Plan (FPMP). It was also noted that there was not a sufficient fire break between the unprocessed wood stockpile and various mixed waste(s) - 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.

It was noted by NRW Officers that there was a large stockpile of mixed waste(s) underneath the 'shed' building on site. Mr. HENDRICKSON indicated to NRW Officers that the feeder conveyor belt machine (known as 'Big Red') was non-operational due to a breakdown. According to Mr. HENDRICKSON, whilst initially this was deemed to be a small breakdown and anticipated to be fixed quickly, it resulted in the machine being non-operational for 3 weeks. During this time, NRW were not notified of said breakdown and waste(s) were still accepted to site which resulted in stockpile of waste(s) in excess of the sites FPMP - see photo 2.

NRW Officers did not witness any excessive noise levels that were of concern or any excessive unpleasant odours. Due to the weather, there were no concerns or issues identified regarding dust. No issues with site security were identified and scavengers (birds) were managed through the on site deterrent system.



Photo 1 - Waste stockpile(s) at GD Environmental



Photo 2 - Waste stockpile(s) at GD Environmental

On the previous site inspection (CAR_NRW0041546), GD Environmental were breached on their environmental permit for areas of impermeable surface that were compromised due to various 'wear and tear' conditions I.E. Vehicle movements / weather and that there was a potential risk of on site contaminants leeching to groundwater causing an environmental issue. On this site inspection it was noted that these identified areas have been repaired by the operator and the flooring infrastructure had improved - see photo 3.



Photo 3 - Improved areas of flooring infrastructure

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.

WASTE RETURNS

GD Environmental have submitted their quarterly waste return for Q2, 2023 on time and in full. For Q2, the site accepted 9,755.28 tonnes and removed 6,910.47 tonnes. No unauthorised waste(s) have been accepted to site.

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 Officers Greg GARDNER and Jodie BASKERVILLE left site at 10.00am 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.