

Compliance Assessment Report CAR_NRW0042504

Permit being assessed: FB3190HP

For: CARDIFF AIRPORT, held by CARDIFF INTERNATIONAL AIRPORT LIMITED

At: RHOOSE, VALE OF GLAMORGAN, SOUTH EAST WALES, ., CF62 3BD.

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

On 21/09/2023, between 10:00 and 12:00.

Parts of permit assessed: All

NRW Lead Officer: Harry Warburton, accompanied by: Hannah Jenkins.

Report sent to: James Morris, QSHE Officer, on 06/10/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Management - General management	C3 Minor	1.1.1 (a)

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Produce a written management system with the points outlined in section 1.1.1 (a)	27/11/2023

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.

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

Natural Resources Wales Environment Officer Harry Warburton and Senior Environment Officer Hannah Jenkins attended Cardiff Airport on 21/09/2023 at 10:00am for a compliance inspection of permit FB3190HP. We met with QSHE Officer James Morris.

Weather conditions on the day were dry with moderate winds. The two days prior consisted of heavy rainfall.

The areas of the airport inspected were the car park interceptor, the BP refuelling yard, the BP interceptor, the coffer dam, the reed bed, and lastly the southside interceptor.

James mentioned the interceptors were being emptied and serviced around the date of inspection.

Car park interceptor:

James first took us to the car park interceptor. There was no flow in the final chamber to the outfall, likely due to being recently emptied. This interceptor outfalls to the Tredogan Brook, James mentioned this outfall to the environment has not been observed. There was no signs of an oil sheen on the surface of the chambers. There was some light litter in the water in a few of the chambers due to there being a small gap between the protective grates.

Recommendation:

- Locate the outfall from the car park interceptor to the Tredogan Brook & inspect the discharge on a regular basis.

BP refuelling yard:

We were then taken to the BP refuelling yard, James mentioned it is now the responsibility of the airport having previously been run by a different company and inquired whether a permit would be required. The yard consists of a 3 chamber oil interceptor. The first interceptor chamber had a visible oil sheen and odour. The third chamber had no apparent sheen or odour. There is a manual penstock after the third chamber.

James mentioned that they are in the process of collating records and plans for the area but was uncertain where the oil interceptor currently discharges to. It is thought that the oil interceptor may lead to Welsh Water foul drainage through a trade effluent consent, however this is not for certain.

Recommendation:

- Provide information and a drainage plan to explain where the oil interceptor and surface water discharges to in this area.
- Confirm what Trade Effluent Consents the airport has in place with Dwr Cymru Welsh Water.

BP interceptor:

The next location was the 'BP interceptor', all appeared to be in good order, no visible oil or hydrocarbon odour. This interceptor is said to outfall to the Bullhouse Brook, this outfall to the brook had not been inspected.

Recommendation:

- Locate the outfall for the BP interceptor to the Bullhouse Brook & inspect the discharge on a regular basis.

Coffer dam:

We were then taken to the coffer dam, the coffer dam had some old booms left within from an old issue thought to have been oil, however was later confirmed to be biofilm. The coffer dam also contained an excess of vegetation that may have led to the biofilm previously. It is unknown the inputs that flow to the coffer dam. The coffer dam outfalls to the Sefton Brook, the outfall location has also had not been inspected.

Recommendation:

- Remove the old booms and excess vegetation from the coffer dam & dispose of appropriately.
- Obtain a better understanding of the inputs that discharge to the coffer dam.
- Locate the outfall to the Sefton Brook & inspect the discharge on a regular basis.

Reed bed:

Next was the reed bed. James mentioned this had not been used for firewater run off in quite some time, due to this, the effectiveness of the reed bed treatment is unknown. There are plans to use this area in the near future for firefighting foam attenuation.

The sampling chamber for the reed bed was in poor condition, with several rusted pipes and debris in the chamber. The reed bed discharges to ground via infiltration.

Recommendation:

- Clear the rust and debris within the chamber and ensure the structural integrity of the pipes.
- Conduct an assessment on the effectiveness of the treatment of the reed bed.

Southside interceptor:

Finally there is the southside interceptor, this is a small interceptor that outfalls to a drain leading to the Severn Estuary. All appeared to be in order at this location. **No recommendations.**

General management:

Permit condition 1.1 for General Management, under section 1.1.1, states there should be a written management system for the site which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints.

On the previous site inspection in 2020 it was mentioned one would be produced, however this was with a former member of staff who is no longer at the airport. This was discussed during the inspection and it was suggested that there may be a partially completed version and other incident response documents for airport operations. However a written management system for the permitted site activities with the points mentioned above will need to be in place for the site. This was the only non-compliance for the site visit.

Action:

- Confirm what management system is in place currently for the site, following receipt of information, we will then consider if there is a breach of permit conditions.
- Produce a final version written management system for the site as outlined above.

This guidance may be of some use in creating the management system if there is not already a draft in place. [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)

Please could you also provide the COSHH forms for the antifreeze used.

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 to 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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of water quality action criteria (used in section 1 and 2):**WQ A: Management**

- WQ-A1 General management

WQ B: Operations

- WQ-B1 Permitted activities
- WQ-B2 The site
- WQ-B3 Operating techniques
- WQ-B4 Improvement programme
- WQ-B5 Pre-operational conditions

WQ C: Emissions and monitoring

- WQ-C1 Emissions to water
- WQ-C2 Emissions to land
- WQ-C3 Emissions of substances not controlled by emission limits
- WQ-C4 Installation of monitoring boreholes

WQ D: Information

- WQ-D1 Records
- WQ-D2 Reporting
- WQ-D3 Notifications

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.