

Compliance Assessment Report CAR_NRW0042853

Permit being assessed: CB3491HU.

For: Englobe Wastewater Treatment Plant Glan Llyn St Modwen Development Site, held by Englobe Regeneration UK Limited

At: Queen's Way, Llanwern, Newport, Newport, NP19 4TZ.

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

On 21/11/2023 between 09:45 and 10:45.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner, accompanied by Cerys Phillips, Rhiannon Munro.

Report sent to: Mr. Christopher Roberts / Mr. Andrew Taylor, Site Managers on 07/12/2023.

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)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	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)	
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
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

This report details the site visit made on the 21st November 2023 to Englobe Wastewater Treatment Plant, Llanwern, permit reference number EPR/CB3491HU. Natural Resources Wales (NRW) Officer Greg GARDNER and Waste Regulation Higher Education Placements Cerys PHILLIPS & Rhiannon MUNRO attended the Englobe Wastewater Treatment Plant, Glan Llyn St Modwen Development Site, Queensway, Llanwern, Newport, NP19 4TZ for an unannounced routine site inspection at 09:45am where we met with Mr. Christopher ROBERTS and Mr. Andrew TAYLOR (Site Supervisors). The weather was dry and reasonably cold.

COMPLIANCE BREACHES

There are no outstanding actions or identified compliance breaches following this site visit.

GENERAL OBSERVATIONS

Mr. ROBERTS and Mr. TAYLOR provided a detailed overview to NRW staff of the process of treating the contaminated water. Contaminated water from the old Llanwern Steelworks site is pumped from a lagoon (see photo 1) to the Englobe Treatment Plant through a series of pipes. There is no potential of the lagoon flooding / overflowing due to various sensors within the lagoon to notify the system to pump water to ensure water levels remain at a safe level.

When the water arrives at the Englobe site, it is passed through a series of sieves and filters to remove sediment / contaminants (see photo 2) as well as treated with chemicals, such as hydrochloric acid, to alter the pH content to as neutral as possible. If this fails to meet the discharge specification, the water is recirculated and treated until the specification is met. Once met, the water is then discharged to a private foul sewer at Tata Steel (see photos 3 and 4).

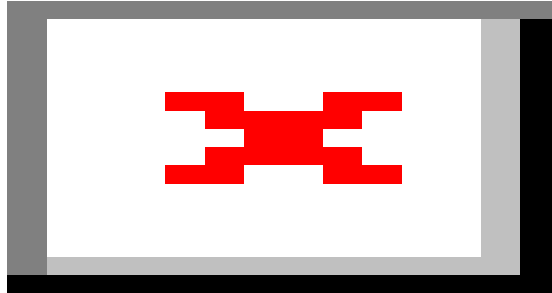


Photo 1 - Water lagoon with contaminated water from development site

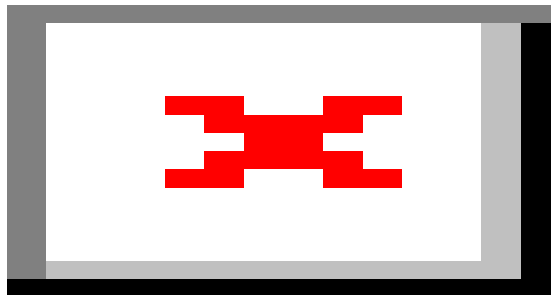


Photo 2 - Series of sieves / filters to remove contaminants from water

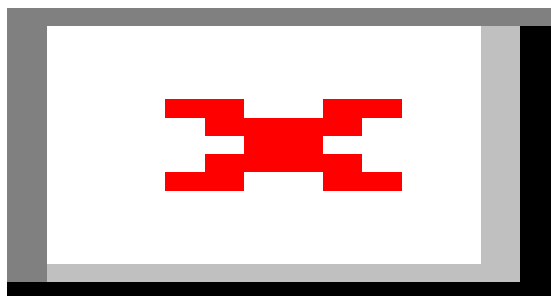


Photo 3 - Treated water being discharged to tank via a series of pipes

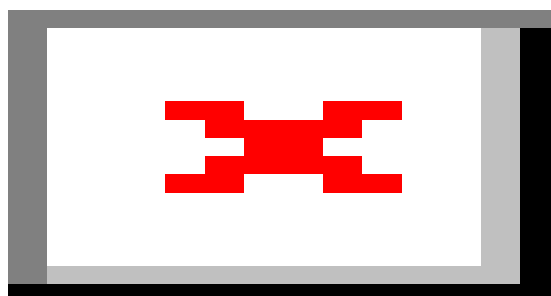


Photo 4 - Treated water in tank ready for discharge to designated discharge point

Mr. ROBERTS and Mr. TAYLOR indicated that in the unlikely event that there is a loss of containment of all liquids contained on site, there is a concrete bunded wall along the perimeter of the site which can hold all the stored liquid with a 10% excess threshold. Following prolonged heavy rainfall, the site has a rainwater pump to remove the pooling of water. This water is pumped back to the lagoon. Photo 5 shows the concrete bunded wall (in black) at the bottom left foreground. The integrity of the bunded wall is checked regularly via visual inspection as well as a flooding the area with a small amount of clean water to identify any potential integrity breaches. There was no issues with regards to the integrity of the flooring / bunded wall by NRW staff during the site inspection

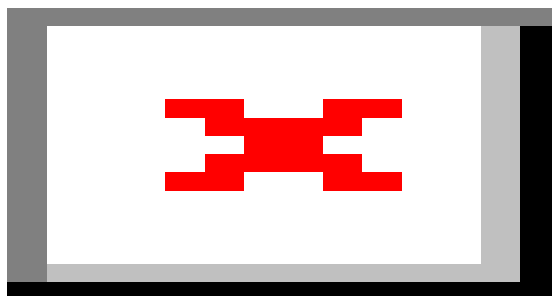


Photo 5 - Concrete bunded wall with rainwater pump (background sunken into flooring)

During the site inspection the housekeeping was kept to a very good standard with no evidence of any loose debris / equipment located on the floor. Storage of materials were kept within designated areas that were identified with various safety labels and securely locked. The integrity of the water tanks was in good condition with good maintenance upkeep. There were no offensive odours or excessive noises identified during the site inspection. Site security was to a good standard with the presence of secure anti-climb fencing located around the perimeter (see photo 6) as well as on site security cameras with 360-degree vision and floodlighting.

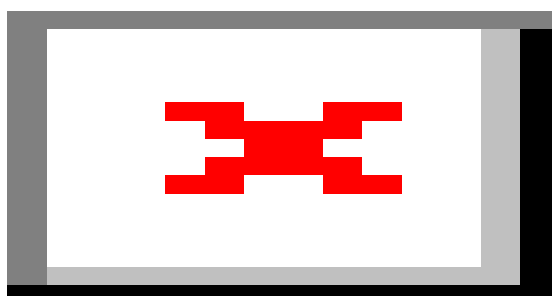


Photo 6 - Secure anti-climb security fencing located around perimeter of site

TECHNICAL COMPETENCE

Mr. Gavin RODWAY is the TCM (Technically Competent Manager) for the site. A copy of Mr. RODWAY WAMITAB (Waste Management Industry Training and Advisory Board) certificate has been provided for NRW records with an expiry date of 13/09/2024.

WASTE RETURN SUBMISSIONS

Englobe Wastewater Treatment Plant, Llanwern have submitted their waste return data for permit, EPR-CB3491HU, on time and in full. For the latest quarter (Q3), the site has received 12,985 tonnes of waste(s) and removed 12,985 tonnes of waste(s). There are no unauthorised wastes that have been accepted on site and are within the annual permitted allowance for the amount of waste to be accepted on site (341,640 tonnes).

As a reminder to the operator, please see below the waste return submission deadlines. A waste return must still be submitted even if it is a null return:

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

The site produces hazardous waste from the wastewater treatment operations. Due to this, hazardous waste consignment notes are required, for each quarter (as above), for any hazardous waste that has been received, removed or disposed at a site. They are a compulsory requirement of the Hazardous Waste Regulations 2005. A hazardous waste return must still be submitted to NRW even if it is a null return (as above).

NRW staff left site at 10:45am the same day.

If you have any issues with this report, please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

I look forward to working with the site in the future.

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.