

Compliance Assessment Report CAR_NRW0042304

Permit being assessed: AB0041901

For: SCA PACKAGING ALEXANDRA DOCKS, held by PAUL BALDOCK

At: SCA PACKAGING NEWPORT, ALEXANDRA DOCKS, NEWPORT, WALES, .

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

On 01/08/2023, between 10:00 and 12:00.

Parts of permit assessed: Site Operations

NRW Lead Officer: Gavin Dodd.

Report sent to: Phillip Stevens , QSE Manager, on 19/12/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Emissions and monitoring - Emissions to water	C3 Minor	1. (a)- The Discharge shall not contain any poisonous, noxious or polluting matter or solid waste matter. And 7. (a)- As far as is reasonably practicable, the Sewage Treatment Plant shall be operated so as to prevent any matter being present in the Discharge to such an extent as to cause the receiving waters, or any waters of which the receiving waters are a tributary, to be poisonous or injurious to fish in those waters, or to the spawning grounds, spawn or food of fish in those waters, or otherwise cause damage to the ecology of those waters.
WQ-C1 - Emissions and monitoring - Emissions to water	C3 Minor	6- A flow measurement structure shall be provided and maintained to enable

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		the daily volume of the Discharge to be measured or determined as required

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-C1	Investigate the problem(s) with the sewage treatment plant and rectify issues to prevent any polluting matter exiting the system	05/02/2024
WQ-C1	Install a flow measurement structure to ensure permitted discharge limit is not exceeded	05/02/2024

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Site Report

I (Environment Officer Gavin Dodd) arrived at SCA Packaging, Newport on Wednesday 1st August 2023 at 10:00 to conduct an inspection regarding a discharge of biologically treated sewage effluent to the River Usk Estuary (Permit Number AB0041901). Site QSE manager Phillip Stevens was also in attendance.

The treatment system on the plant was a Klargester system, consisting of three chambers. Waste enters the primary chamber, which is then filtered when passing through the second and third chamber. After filtration, the liquid effluent then enters the sampling point chamber before discharging to the River Usk Estuary. The weather conditions at the time of the inspection were initially sunny, though there was a light shower shortly after the inspection commenced at approximately 10:30.

The treatment plant (Figure 1) was accessed by walking through the factory to the rear of the building. The location of the plant was confirmed to match the NGR provided in the permit (ST3190284143) and then inspection of the chambers (Figures 2&3) was carried out. There was an odour to both the primary and final chambers, though it was not as

strong in the latter. Aeration was observed in the final chamber of the system. Solid waste was observed only in the primary chamber.



Figure 1: Location of treatment system



Figure 2: Primary chamber of treatment system



Figure 3: Final chamber showing aeration of effluent

No ragging or excess waste was observed on the ground outside of the system. It was not

possible to identify whether the NGR on the permit for the discharge point was correct, as access was prevented due to overgrown vegetation (Figure 4). The inspection chamber showed signs of staining to the discharge pipe. Sewage fungus and scum was also visible in the chamber. While the discharging water appeared clear initially, there was some particulate matter in the water which was being carried through the inspection chamber and into the River Usk Estuary (Figure 5). I confirmed that the plant was serving 180 employees and that this has not changed. There was no flow measurement structure in place on the treatment system; this had not been in place since the system was installed. I was informed by Mr Stevens that engineers were called out to service the system when issues occurred and it was desludged as required.



Figure 4: Discharge point inaccessible due to overgrowth



Figure 5: Inspection chamber showing staining and some scum

Breaches

1.) Condition: 1. (a)- The Discharge shall not contain any poisonous, noxious or polluting matter or solid waste matter. And **7. (a)-** As far as is reasonably practicable, the Sewage Treatment Plant shall be operated so as to prevent any matter being present in the Discharge to such an extent as to cause the receiving waters, or any waters of which the

receiving waters are a tributary, to be poisonous or injurious to fish in those waters, or to the spawning grounds, spawn or food of fish in those waters, or otherwise cause damage to the ecology of those waters.

Justification: The inspection chamber showed signs of staining to the discharge pipe. Sewage fungus and scum is also visible in the chamber. While the discharging water appeared clear initially, there was some particulate matter in the water which was being carried through the inspection chamber.

2.) Condition:6- A flow measurement structure shall be provided and maintained to enable the daily volume of the Discharge to be measured or determined as required.

Justification: No meter or other flow measurement structure has been installed on the sewage treatment plant.

Actions Required by Dates Specified

Action 1- Investigate the problem(s) with the sewage treatment plant and rectify issues to prevent any polluting matter exiting the system.

Action 2- Install a flow measurement structure to ensure permitted discharge limit is not exceeded.

The deadline for the above actions is the 5th February 2024

Contact details:

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Gavin Dodd, Environment Officer, gavin.dodd@naturalresourceswales.gov.uk, 03000 65 3193.

If we do not receive the information requested within specified deadline and have not been informed as to why there is a delay then we may serve a Regulation 60 Notice requiring the information under Environmental Permitting (England and Wales) Regulations 2016

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.