

Compliance Assessment Report CAR_NRW0043193

Permit being assessed: BP0300101

For: SWANSEA BATCHING PLANT KINGS DOCK, held by Breedon Trading Limited
At: SWANSEA BATCHING PLANT, TARMAC WESTERN LIMITED, READY MIX
CONCRETE PLANT, KINGS DOCK SWANSEA, SA18QU.

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

On 18/01/2024, between 11:05 and 11:50.

Parts of permit assessed: Operations

NRW Lead Officer: Catherine Tucker, accompanied by: Gareth Martin, Daniel Wood.

Report sent to: Chloe Parker, Sustainability Coordinator & Environmental Permitting
Manager , on 25/01/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B1 - Operations - Permitted activities	Assessed (A)	
WQ-B2 - Operations - The site	Assessed (A)	
WQ-B3 - Operations - Operating techniques	Assessed (A)	

Result types are explained in more detail 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

On the 18/01/2024 we attended Breedon Trading Limited Batching Plant, Kings Dock, Swansea to carry out a permit inspection. The permit is for trade effluent discharge of site drainage and process water, permit number BP0300101. The purpose of the inspection was to check compliance with the conditions of the permit, it was the first visit to the site in several years. The site inspection was arranged with Production Manager Matt Dougherty. The weather conditions were dry, cold and sunny.

After arriving on site, you showed us the location of the treatment system which comprised of three settlement tanks of settled site drainage and process water from the site, a sample point and interceptor .

You told us that the water in the treatment system is solely trade effluent consisting of a combination of settled site drainage and process water.

We were unable to check the discharge point and pipe as it is located outside of the site boundary and is fenced off.

You showed us the location of the labelled Sample Point and told us how it is maintained for access. The sample point is shown correctly on the permit maps although the grid reference is incorrect in the permit. The correct grid reference for the sample point is SS 67770 92790. **We would advise this is corrected if the need for a permit variation arises.**

During the inspection you explained to us that you do not reach the maximum flow volume and the discharge is carried out periodically and in-line with the process water and rainfall on site.

You explained that the sample point is regularly inspected for oil and grease and a turbidity test is carried out before discharging from the treatment system. You also told us that there is an interceptor in place after the sample point. You explained to us that you would not discharge from the treatment system if the sample was contaminated.

You told us that you do not treat any of the water on site with flocculant.

I visually checked the 3 stages of treatment of the treatment system and confirmed that the plant appeared to be operating as designed at the time of the inspection. The treatment system was not near its capacity or discharging during the site visit.

You told us that the settlement tanks are cleared of any solid matter which is removed and stored in a waste pit and you instruct an environmental company to remove the dry materials from site.

Site Operations

10. Site operations shall be conducted in accordance with the Code of Practice attached as Annex 1.

The Annex 1 Code of Practice describes the provision of a recycled water holding tank facility of 35 cubic metres. During our visit you informed us that no holding tank facility is in place as the engineered design of the site itself, being bowl shaped, can accommodate any flows in excess of that for which the 3 settlement tanks are designed to effectively treat. In other words, the 'bowl' is the excess storm storage.

At this point in time, we have not recorded the lack of a holding tank facility as a non-compliance as we believe you have a suitable alternative practice in place. When Codes of Practice change it is normal to alter them, with our agreement. We will investigate if

there is a mechanism for the Code of Practice to be amended without the permit needing to be varied.

During our discussion in the site office, you showed us records for the discharge during December 2023 and January 2024. You told us that you keep all paperwork relating to the treatment system and discharge. The discharge records showed the metered flow readings did not exceed the permitted discharge flow level of 85 cubic meters per day. You also showed us your Operating Procedure and equipment for sampling the discharge.

Thank you.

END.

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.