

Compliance Assessment Report CAR_NRW0043227

Permit being assessed: QB3093HE.

For: Alexandra Docks, held by South West Wood Products Limited

At: East Way Road, Newport, NP20 2NP.

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

On 24/01/2024 between 09:00 and 09:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner.

Report sent to: Ms. Rita Vassallo, Technically Competent Manager on 07/02/2024.

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	3.4.1
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	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
1	4

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 unprocessed waste wood on the 'top yard' to ensure compliance with your site FPMP, EMS and official FPMP guidance	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.

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

This report details the site visit made on the 3rd May 2023 to South West Wood Products, Newport, permit reference number EPR-QB3093HE.

Natural Resources Wales (NRW) Officer Greg GARDNER attended the South West Wood Products site at Alexandra Docks, East Way Road, Newport, NP20 2NP for a unannounced routine site inspection at 09:00am where I met with Mr. Christopher CHENEY (Site Manager). The weather was dry and reasonably mild which it had been the previous day.

PERMIT BREACHES AND / OR ACTIONS

Below are permit breaches and / or actions 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 waste not being stored in compliance with FPMP guidance and sites FPMP document.

Please see report content for further justification

SITE INFRASTRUCTURE

The site was operational at the time of the inspection. The general housekeeping on the site was in good condition with no major amounts of loose debris located on the floor (as seen in photo 1). South West Wood Products have an on site dust suppression system to reduce the amount of dust / fines in the atmosphere by using a tractor with an attached water bowser as well as street sweeper. This is undertaken regularly to reduce the excess wood dust / fines in the atmosphere. The flooring was also in good condition with no apparent damage / defects as well as the interceptor drainage system which was again, operational with no

apparent issues.



Photo 1 - Housekeeping and flooring infrastructure at SWWP Ltd, Alexandra Docks

WASTE ACTIVITIES - WOOD WASTE

During the site visit it was noted that the unprocessed wood stockpile height was not in compliance with the sites designated Fire Prevention Mitigation Plan (FPMP) document as seen in photos 2 and 3. The stockpile height, was not at the 4 metre recommended maximum height dictated by the sites FPMP document and were adjudged to be in excess of 4 metres. It was noted that the stockpiles are constantly changing due to fluid turnaround of material on site however due to amount of unprocessed wood as well as the potential fire risk of the combustible material, the site were in breach of their permit.

A follow up email was submitted by SWWP Ltd Technically Competent Manager (TCM), Ms. Rita VASSALLO showing the stockpile of unprocessed wood returning back into compliance (see photo 4. As a reminder to site management, always ensure wood stockpile heights (both processed and unprocessed) remain in compliance with your sites FPMP documents with regards to stockpile sizes.

The majority of the woodchip that is stored on site is processed, via a large industrial shredder, to make it into smaller / finer items. This is then ready for transportation to other sites for further processing and / or recovery with the majority of material ending up as fuel for the Margam Green Energy Plant. The wood waste is tested on site in a laboratory for sizing and moisture content to ensure the correct grading category can be applied before despatching to the end user.



Photo 2 - Large stockpile of unprocessed wood not in compliance with the sites FPMP



Photo 3 - Large stockpile of unprocessed wood not in compliance with the sites FPMP



Photo 4 - Photo from TCM of unprocessed wood back in compliance with sites FPMP

NRW Officer Greg GARDNER left site at 09:30am 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.