

## Compliance Assessment Report CAR\_NRW0043870

**Permit being assessed:** AN0267401

For: ALEXANDRA DOCKS NEWPORT, held by SAICA PACK UK LTD

At: ALEXANDRA DOCKS, NEWPORT, NEWPORT CBC, WALES, .

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

On 18/03/2024, between 10:30 and 11:20.

Parts of permit assessed: Site Operations

**NRW Lead Officer:** Gavin Dodd.

**Report sent to:** Phillip Stevens , QSE , on 22/05/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor	Condition 6- The discharge shall not exceed 0.56 litres per second

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	Install a flow measurement device or devise method of measuring flow from the system to ensure compliance with permit	30/06/2024

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.

**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

I (Environment Officer Gavin Dodd) arrived at SCA Packaging, Newport on Monday 18<sup>th</sup> March 2024 at 10:30 to conduct an inspection regarding a discharge of treated trade effluent to the River Usk Estuary (Permit Number AN0267401). Site QSE manager Phillip Stevens was also in attendance.

The treatment tank was accessed by walking through the factory and to the rear of the building. The trade effluent consisted of treated wash downs from printing operations within the factory and also from hand washing basins. These washings entered a treatment tank (Figure 1) in which contaminants from the processes were removed and waste water was separated from solids. The capacity of the tank was 12 cubic metres, allowing the tank to be fully emptied twice a day in compliance with the permit. A daily discharge log for the trade effluent was kept nearby (Figure 2) and consisted of a visual inspection and pH measurements, both of which were compliant with conditions listed in the permit. An alarm panel was in place which displayed the current pH reading (Figure 3). The rate of discharge of the system could not be determined and no flow measurement structure was in place. The water from the tank entered a barrel (Figure 4, sampling point) and from there discharged into the Usk. Though the water in this barrel appeared black, the results of sampling undertaken by NRW for the year to date for pH and suspended solids were within the permitted limits and no solid matter was present in the discharge.

It was not possible to access the consent point for the discharge as access was blocked by vegetation (Figure 5). The discharge was instead inspected from a manhole at ST3207984276, though it was difficult to discern the colour of the water as it was several metres beneath the manhole cover (Figure 6). Left site at approx. 11:20.

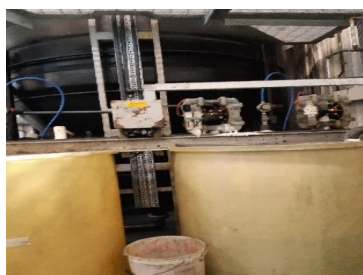


Figure 1: Treatment Tank

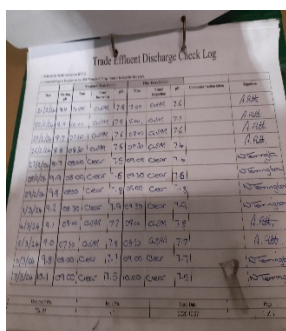


Figure 2: Trade Effluent Log



Figure 3: Alarm panel with pH reading



Figure 4: Sample point



Figure 5: Access issue to consent point



Figure 6: View of discharge prior to reaching consent point

**Breaches**

1.) **Condition 6-** The discharge shall not exceed 0.56 litres per second.

**Justification:** No flow measurement structure is in place for the system.

**Actions Required by Dates Specified**

**Action 1-** Install a flow measurement device or devise method of measuring flow from the system to ensure compliance with permit.

**The deadline for this action is 30<sup>th</sup> June 2024**

**Advisories**

Remove overgrowth to better provide access to consent point.

**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](mailto: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](mailto: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.