

Compliance Assessment Report CAR_NRW0044478

Permit being assessed: DB3196HH.

For: Berth 31, **held by:** South West Wood Products Limited

At: Wimborne road, Barry Docks, Barry, Vale of Glamorgan, CF63 3DH.

Type of assessment: Site Inspection,

Reason: Routine.

On: 29/05/2024 between 11:00 and 12:15.

Parts of permit assessed: 1.1.1, 1.1.4, 3.4.1.

NRW Lead Officer: Elysia Lovelock, accompanied by Dafydd Evans, Aimee Lintern.

Report sent to: Lucy Binnie, Operator's Environmental Consultant , on 03/06/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Action only (X)	
W1A - Waste - Management - General management	Action only (X)	
W3G - Waste - Emissions and monitoring - Fire	Action only (X)	

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

Total 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?

Criteria	Action needed	Complete by
W1A	Please provide copies of Technically Competent Manager certifications (as required under condition 1.1.4)	10/06/2024
W1A	Please provide a date (within 5 working days) by which a copy of the sites Environmental Management System (required under condition 1.1.1) can be submitted to Natural	10/06/2024

Criteria	Action needed	Complete by
	Resources Wales for review.	
W3G	Please provide a date (within 5 working days) by which a copy of the sites Fire Prevention and Mitigation Plan (required under condition 3.4.1) can be submitted to Natural Resources Wales for review.	10/06/2024

Compliance 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, Senior Industry and Waste Regulation Officer Elysia Lovelock and Waste Regulation Higher Education Placements, Officer's Daffyd Evans and Aimee Lintern, attended the permitted facility of South West Wood Products Limited, Berth 31, Wimborne Road, Barry Docks, Barry, CF63 3DH to undertake an announced site inspection on Wednesday 29th May 2024. During the visit, the weather remained dry with sunny intervals.

On arrival at approximately 1100 hours, we were met by the Operator's Environmental Consultant, and were joined by representatives of South West Wood Products Limited, including the Operations Manager, Health & Safety Officer, Technically Competent Manager and one of the Site Manager's for the new facility.

The purpose of the announced site inspection by Natural Resources Wales officers was to perform the first site inspection of the newly permitted waste operation, as required within 3 months of issue, and to assess the sites compliance with the conditions of the environmental permit held by South West Wood Products Limited, reference EPR-DB3196HH.

As the site was pre-operational at the time of the initial visit, this report details a basic initial site inspection, and a follow up visit will be undertaken in due course to assess compliance with the permit.

The environmental permit was issued 25th April 2024. Standard rules SR2011 No4 are conditions of this permit. The environmental permit allows the operator to store and treat waste wood at the specified location, with a permitted annual tonnage of 75,000 tonnes.

We discussed the site drainage, site security, potential configurations for storage of processed and unprocessed waste and potential mitigation measures for dust and run-off, and measures for incident management i.e., access etc. The Operator was also informed of information which is routinely provided to an Operator of a newly permitted site, including information on the relevant Technical Guidance, waste return requirements, compliance/CCS Scores, Compliance Assessment Reports, the Public Register, Duty of Care requirements, and requests for site documentation were made (as below).

I requested the following documents, as required under conditions 1.1.1, 1.1.4 and 3.4.1:

- Environmental Management System
- Copies of Technically Competent Manager WAMITAB certification(s)
- Fire Prevention and Mitigation Plan

As the visit was pre-operational, these have been recorded as 'actions only'. Within 5 working days, please provide a date by which you will submit the above to Natural Resources Wales. The Environmental Management System and Fire Prevention and Mitigation Plan will then be reviewed in due course.

Advice and guidance was provided on site in relation to the following, prior to the commencement of operations, as follows:

- Please ensure details of the arrangements concerning the maintenance and inspection of the interceptor which serves the site, are detailed within the sites EMS.
- Please ensure the necessary coupling link for the water tank is available on site.
- Please ensure the small amount of waste found within one of the Maltese cross, has either been removed, or quarantined pending removal to an appropriately authorised facility. We recognise that this has occurred on site prior to the commencement of operations/site occupancy.
- Please ensure the integrity of the impermeable surface and drainage, by way of regular inspections and maintenance, as required. Some growth within the drainage channels and impermeable surface has occurred within the time the site has been vacant, which will need clearing prior to operations commencing.
- Please ensure waste returns are submitted to Natural Resources Wales, covering the period from the time of permit issue (i.e. April 2024 onwards).
- Once you have agreed an approach for any necessary additional mitigation for the site for run-off, dust etc, e.g., bunding, netting etc., please keep the site's regulation officer informed, in case either the Environmental Management System or Fire Prevention and Mitigation Plan you submit, will need updating further as a result.

As advised on site, a follow up email detailing the above was sent via email on 30th May 2024 to the site's Environmental Consultant.

The visit concluded at 1215 hours. We wish to thank all of you for your time during the inspection. **Please refer to Section 2. What action is required? Please respond within 5 working days of receipt of this Compliance Assessment Report.**

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.