

Compliance Assessment Report CAR_NRW0044663

Permit being assessed: AN0325701

For: SIMSMETAL NORTHSIDE SOUTH DOCK, held by COMPANY SECRETARY
At: SIMSMETAL UK LTD, NORTHSIDE, SOUTH DOCK, ALEXANDRA DOCK NEWPORT,
NP20 2WE.

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

On 07/06/2024, between 11:00 and 12:00.

Parts of permit assessed: Site Operations

NRW Lead Officer: Gavin Dodd.

Report sent to: Wayne Taylor, Production Manager, on 03/07/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-A1 - Water Quality - Management - General management	C3 Minor	Condition 7- The water treatment facilities shall be maintained in an efficient operational condition at all times.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-A1	Provide the most recent servicing records for the interceptor systems, along with evidence of filter change over and sampling records	31/07/2024

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 Simsmetal, Newport on Friday June 7th 2024 at 11:00 to conduct an inspection regarding a discharge of trade effluent (site drainage) to the South Dock, Newport Docks (Permit Number AN0325701). Site production manager Wayne Taylor was

also in attendance. Mr Taylor first showed me the two septic tanks on site. Though these were not a part of this permit inspection, both had working alarm panels and did not appear to be discharging non treated water to South Dock.

Permit AN0267401 concerned the discharge of treated site drainage to the South Dock, Newport. The discharge was treated through two three stage interceptors on site and discharged to the South Dock at ST3176285206; the discharge point (marked as consent point on the permit) was accurate to the NGR specified in the permit.

The discharge was inspected at the sample point specified in the permit ST3174285187 (Figure 1). It was not possible to inspect the discharge at the consent point as vegetation was overgrown here (Figure 2). The discharge was flowing clearly and did not contain any visible oil or grease. The main method of treating the site drainage was the use of the interceptor systems which also had filters within them (Figure 3). There did not appear to be an adverse environmental impact to the waters nearest the consent point, though the latest sampling results provided were from 2022. Left site at approx 12:00.



Figure 1: Sample point/ inspection chamber



Figure 2: Vegetation blocking visibility, access to consent point



Figure 3: Final inspection chamber of interceptor

Breaches

1.) Condition 7- The water treatment facilities shall be maintained in an efficient operational condition at all times.

Justification: Servicing records for the interceptor systems were not available on site.

Actions Required by Dates Specified

Action 1- Provide the most recent servicing records for the interceptor systems, along with evidence of filter change over and latest sampling records.

The deadline for this action is 31st July 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 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.