

Compliance Assessment Report CAR_NRW0045174

Permit being assessed: AB3698CV.

For: Airfield Metals, **held by:** Airfield Metals Limited

At: Carew Airfield, Carew Airfield, Carew, Tenby, Pembrokeshire, SA70 8SY.

Type of assessment: Site Inspection,

Reason: Routine.

On: 05/09/2024 between 10:20 and 11:00.

Parts of permit assessed: W1, W2, W4.

NRW Lead Officer: David Morgan, accompanied by Hugh Martin.

Report sent to: Nening Jones , Director, on 12/09/2024.

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	C3 Minor	1.1.1 (a)
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W4A - Waste - Information - Records	Assessed (A)	

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

Total 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
W1A	Operate activities in accordance with a written management system that identifies and minimises the risks of pollution	05/06/2025

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

A site inspection was undertaken on Thursday 5th September 2024. The purpose of the inspection was to review non-compliances that were recorded by Natural Resources Wales in the previous inspection on 5th June 2024 (Compliance Assessment Report reference: CAR_NRW0044514).

Previous Inspection

In the previous inspection, on 5th June 2024, non-compliances were recorded against General Management (W1A) and Records (W4A).

The Category 2 non-compliance recorded against General Management was attributed to a number of issues including site security, drainage and waste storage (waste vehicles being stored outside the permitted boundary/waste escaping site).

Site Security was reviewed during the inspection on 5th September 2024. It was noted that efforts had been made to improve site security including the installation of Heras fencing by the site office. While this could be deemed a visual deterrent, unauthorised access could be made to site.

You must maintain site security to prevent unauthorised access which can lead to such issues as arson/fly-tipping.

Site security was deemed as non-compliant although it is accepted that the risk is lowered since the previous inspection.

Drainage on site consists of a channel leading to a sealed sump. Drains and the sump itself were not accessible during the inspection although paperwork was provided to highlight that the sump had been recently emptied. In the previous inspection, this drainage channel contained oil and on this occasion, oil had appeared to have been removed.

In this area, however, there were signs of oil spillages/leaks and there was a strong odour of oil in this area. It is recommended that general housekeeping is improved and any spills/leakages are dealt with when identified.

Waste Storage practices were reviewed on 5th September 2024. It was noted that numerous waste end-of-life vehicles had been removed from outside the site boundary, however, there were still an end-of-life vehicles stored off site. This must be removed.

General Management

Overall general management on site has improved since the previous inspection and it was noted that efforts had been made to improve site security, maintain drainage and improve waste storage procedures. Operations, on 5th September 2024 were not deemed compliant, although it is recognised that overall risk posed is lowered and this is reflected in the non-compliance recorded.

A non-compliance (Category 3 - Minor)(Ref:W1A) has been recorded against condition 1.1.1 (a) of your Environmental Permit.

It is recommended that you review operations against your Environment Management System (EMS) and take into account the detail in the document '*How to comply with your Environmental Permit*' Guidance ([How to comply with your environmental permit \(naturalresources.wales\)](https://naturalresources.wales)).

Records

Following an inspection of the site, copies of the Environmental Permit and EMS were requested and made available for inspection. This has been assessed as compliant although these documents have not been recently reviewed by Natural Resources Wales.

The most recent copy of the Environment Management System is dated June 2019. Given the changes to operations, we recommend you now review the Environment Management System and Fire Prevention and Mitigation Plan.

Next Inspection

During the next inspection, it is likely that Natural Resources Wales will be assessing operations against the Environment Management System and Fire Prevention and Mitigation Plan. We suggest that these documents are reviewed and that some training take place so all staff are aware of their responsibilities and role in achieving compliance with the Environmental Permit.

Actions

You must undertake the following actions:

- * Improve Site Security
- * Improve General Housekeeping (specifically spillages)
- * Remove waste vehicles from outside the permitted boundary
- * Store waste in compliance with parameters of Fire Prevention and Mitigation Plan
- * Ensure drainage is maintained and accessible for inspection upon request
- * Operate activities in line with the Environment Management System

While on site we discussed the potential changes to the site and to a neighbouring facility. To allow these changes to take place, and or improvements to be made, we are requesting actions are complete and you are fully compliant with your permit by the next inspection that is provisionally planned for **Thursday 5th June 2025**.

Thank you for your time during the inspection.

END OF REPORT

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.