Compliance Assessment Report CAR_NRW0048105

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: 29/01/2025 between 11:00 and 13:12.

Parts of permit assessed: W1A, W3G.

NRW Lead Officer: Elysia Lovelock, accompanied by Daniel Hopkin.

Report sent to: Site Manager/TCM, Site Manager/TCM, on 15/04/2025.

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	Assessed (A)	
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
W3G	Please address actions numbered 1-6 contained within the Report providing the required information, and should you wish to amend the FPMP considering this report, please inform your regulation officer within 7 working days (excl. bank holidays) of receipt of this report, so any amendments can be made prior to review by NRW.	28/04/2025

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

Senior Industry and Waste Regulation Officer Elysia Lovelock and apprentice Daniel Hopkins of Natural Resources (Body for) Wales attended the permitted facility of South West Wood Products Limited, Berth 31, Wimborne Road, Barry Docks, Barry, CF63 3DH; environmental permit EPR-DB3196HH refers.

Arriving on site at approximately 11am, officers were met by two representatives from the Fire and Rescue Service, the Site Manager/Technically Competent Manager and the Operator's Environmental Consultant as arranged, and were also joined by four other representatives of South West Wood Products Limited.

The Operator provided a revised Fire Prevention Mitigation Plan titled 'Berth 31 Barry Docks FPMP SR v1.3 08 10 2024' as requested following the initial site inspection, CAR_NRW0044478 refers. And the purpose of the announced site inspection of the permitted facility was to undertake a joint visit with the Fire and Rescue Service to discuss the sites Fire Prevention and Mitigation measures. The weather remained fine during the inspection.

The sites drainage was discussed initially as this was previously raised with the Operator, in relation to an interceptor beyond the permitted boundary. The Operator has since confirmed via email that the interceptor is not being used by the site. A review of the FPMP in line with guidance note 17 will cover a review of what information is required re the drainage serving the site, integral to the containment of firewater. As the wood is stored on impermeable surface, sealed drainage is required, and a detailed understanding of the site's drainage is imperative for containment of firewater.

ACTIONS ONLY:

1. Due to the recent permit variation, please clarify what site infrastructure is in place on the land gained i.e. impermeable surface with sealed drainage or hardstanding.
2. I also note the site is situated next to an area of unmade ground as shown below. Please clarify what measures are in place to contain site run-off within the boundary of the site here. The FPMP under 4.3.3. refers to bunding. This will be addressed in the FPMP review.

Being situated on the docks, use of the site allows for predominantly shipping/export operations. When a boat becomes available, (depending on the boat), a single boat can remove up to a third of the material stored on site, and the Operator then works within a specified window in which to load the ship. Should any unexpected events occur, such as limited boat availability, a fire or receiver site shutdowns, the Operator has other sites in which wood can be diverted to in any case.

The stockpiles and site storage layout as per the FPMP were discussed.

During the inspection, a number of small waste deposits were seen, skirting beyond the edge of the impermeable surface. We were advised that the Site Condition Report documented this as contaminated land beyond the permitted boundary.

Further information is needed to establish responsibility regarding the deposits that skirt the perimeter, as a site condition visit was undertaken prior to the previous operator surrendering their permit, at which time there were no deposits present.

ACTION ONLY:

3. Please provide a copy of the Site Condition Report.

At the time of the inspection, a number of concrete blocks commonly referred to as ‘lego blocks’ left by the previous occupants, were being used length-ways along some of the stacks. The FPMP states lego blocks will be used to provide fire protection under 2.2.

ACTION ONLY:

4. As there were not enough blocks to create full walls at the time of the inspection, please clarify whether the blocks will either be removed, or have now been added to.

There was some discussion on site about the availability of bespoke fire engineering calculations. In the absence of bespoke calculations from a suitably qualified and competent fire engineer, we would recommend the Operator default to the NRW guidance note 16.

The possibility of using probes was also discussed, however the limitations of a suitable thermal device were recognised, as they would need to be capable of reaching all parts of the stacks. The Operator did also make the point that the piles are not there long enough to justify the use of probes, and that there is a full rotation plan in place, as reducing moisture in the wood itself is also a driver for the Operator to turn stock around quickly.

The Operator explained that the majority of wood stored on site is unprocessed wood, which has an inherently lower risk of self-combustion. And wood is processed to order to avoid unnecessary degradation, therefore reducing the amount of time processed wood is stored on site, managing the higher risk of self-heating, inherent with processed wood. Any processed material left for any significant period would be more susceptible to increased moisture content when exposed to the elements which is undesirable when producing a product.

There appeared to be a small stockpile of fines on site. The Operator explained that small amounts of this material are then distributed amongst processed material. The storage of all material will be addressed in the review of the sites FPMP.

All wood arriving on site is inspected upon tipping for foreign materials and then again after processing before it leaves the site as woodchip, and customers are audited for quality assurance purposes.

The Operator has upgraded the site security, therefore also lowering the risk posed by external heat sources. With an added feature of Geotagging 24/7 being utilised to ensure that site security are physically checking all areas of the site during shifts for visible signs of self-heating/hot spots. The Operator explained they also have used ex-fire service to provide training for their staff. In addition to this, power supply is being extended across the site, so further camera's and on site facilities including a rest room towards the other end of the site can be installed, ensuring staff are within close proximity to plant machinery at all times during operational hours, so staff leaving hot machinery unattended for any length of time are still within view of where staff congregate.

Alternative arrangements in the event of an emergency were also discussed and if the site reaches its safe storage capacity, or if there is a breakdown or fire, alternative waste management options are available to this Operator, having a number of sites, as detailed under point 3.36 contingency arrangements in the FPMP.

The sites primary water supply is a water tank with a capacity of a 1,000,000 litres and protection has been installed around the perimeter of the water tank. A gantry has been fitted, and a suction hose is in place and FRS confirmed this would be suitable to connect to a fire engine hose if it was a 100mm fitting, however for confirmation, this would need to be tested. There is also a tractor and tanker available on site. The water collected within the water tank is also tested for legionnaires. It is also recirculated during day-to-day operations, as it is used for dust suppression, collecting via the gully and then is fed back into the tank.

The water collected in the tank is site run-off and that the tank is manually filled using the bowser to pump the water from the gully into the tank. Consideration will be given to this in review of the sites FPMP in relation to the potential risk to the containment of firewater.

Wetting agent was discussed as being available on site. The availability of wetting agent on site does not reduce the amount of water needed. Wetting agent is a tool for use by the FRS and the decision on whether to use the wetting agent available, would be a decision for the local crew on the day and cannot be guaranteed. Operators can contact the fire group leads within the FRS to discuss wetting agent should they wish. NRW can help with providing contact details for the fire group leads within the FRS. This will be considered in review of the sites FPMP.

Other water supplies were discussed, including the possibility of extracting water from the dock in the event of a fire. And the length of hose needed to reach the water level in the dock was considered. The FPMP states hydrants are available also but have not been considered for use within the sites current fire plan strategy. The FPMP states 'The water in the docks is fresh water and available for use in firefighting. This has been confirmed by the Docks'.

ACTION ONLY:

5. Please provide evidence of any permission to extract water from the docks.

In reviewing the sites FPMP, how the FPMP shows consideration for the site specifics and practicalities of firefighting will be reviewed i.e. Distance to reach the water level, length of hoses required, information on the dock itself (i.e. is it tidal, if so, the Operator would should consider the variations in water depth) etc.

Other site-specific issues, in addition to the above were discussed. With the site being on the docks, there is a train which comes through. Point 1.7 in the FPMP, states – 'Private railway sidings for the docks are closer to the site including passing immediately on the eastern side of the site.' The FPMP review will look at how the Operator has shown consideration for how/if this may affect firefighting during an incident.

ACTION ONLY:

6. Being on the docks, please clarify whether there are any restrictions on material leaving by road.

Due to the exposed nature of the site, dust management was discussed in relation to processing activities and when loading ships. The Operator explained they have dust cannons, which can be moved depending on the wind direction and nets.

The operator explained that the shredder on site can also shred 140 tonnes an hour, making the processing more efficient which also means the processed material does not have to be stored for as long, when preparing an order. Thereby further helping further limit the risk of wind-blown material and self-heating in the processed material during storage.

The visit concluded at approximately 1312 hours.

From discussions and observations whilst on site, the Operator shows a clear consideration for general fire principles (see bullet points below). And when reviewing the sites FPMP, consideration will be given to how the below aspects discussed on site have been reflected in the site's FPMP.

- This site has mitigation measures in place to help manage the risk of hotspots and greater risk in this case of external heating sources, including 24 hr site security and a geotagging system for site security staff to ensure visual inspections occur.
- The visual inspections of incoming and outgoing material undertaken show an awareness of risk factors including metal content, proportion of fines, mixing of materials and heat generated during treatment.
- The operator stores material in its largest form prior to processing and the site processes wood to order, which is then stored for a short period, prior to being shipped. And due to the speed of the machinery available to chip the wood on site, it can be processed as it is being loaded onto the ship, therefore, further reducing the storage times of processed wood, due to the capability of the Operators plant machinery.
- There is a clear business priority/need to control moisture levels and ensure stock rotation for all stored materials, as stock is regularly rotated to ensure the best quality

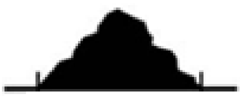
product woodchip can be produced with limited moisture content. This practice is helpful when a site, as a result of producing a quality product, is at the same time also managing a risk through limiting storage times and the drivers for that are evident.

We include further information below for your consideration moving forward.

Managing Waste Material Stacks and Self-combustion Factors

The guidance states that materials at risk of self-combustion, if stored for more than 3 months, include wood. However, it is recognised that wood stored in unprocessed form does present a lower risk of self-combustion, than processed wood. As recognised by the Operator. With the greater risk to unprocessed wood, being from external heating sources.

The storage of unprocessed wood in loose, triangular stacks, allows for better airflow (as shown in the guidance, see diagram exert below). Due to the size of the unprocessed material, air can pass through more freely through the gaps between the wood. Triangular shaped stacks also collapse internally.



Water Supply

Only water that is considered clean by the Fire and Rescue Service, with suitable connections available for fire service vehicles, would be considered for use by the Fire and Rescue Service. FRS confirmed connections require testing to confirm suitability, as explained above. It is noted that the operator advised that oil can gather in the gully which feeds the tank.

Please consider the following about water supply:

- When using a tank to simultaneously hold firewater created whilst releasing water to use, at what stage does recirculation occur. Although the sites FPMP does not specify recirculation of firewater as a part of the firefighting strategy, the above should be recognised. And the increased risk of using this water over time during an incident should be risk assessed, due to the increased concentration of contaminants as water is recirculated back into the tank.
- With larger stockpiles, more water would be needed, therefore containment of larger amounts of firewater would need to be considered.
- With the site being on a dock, the risk of firewater entering the dock would require assessment and evidence of suitable containment measures, including suitable drainage systems.
- As advised above, the availability of wetting agent on site does not reduce the amount of water needed. Wetting agent is a tool for use by the FRS and the decision on whether to use the wetting agent available, would be a decision for

the local crew on the day and cannot be guaranteed. Wetting agent is primarily used on compacted materials, so unprocessed wood is not compacted therefore the FRS would be unlikely to use wetting agent. Wetting agent would be suitable for a pile of processed wood chip. Operators can contact the FRS to discuss the wetting agent they have available should they wish. NRW can help with providing contact details for the fire group leads within the FRS.

ADVICE & GUIDANCE: All sites are different and therefore suitability of every FPMP is reviewed by NRW on a case-by-case basis.

If the operator did wish to move away from the guidance, as briefly discussed on site, Natural Resources Wales require an acknowledgment of the increased risk in doing so, and for the Operator to clearly add additional prevention and mitigation measures as a separate section in a revised FPMP, including a clearly updated review of the sites risk assessments, separation distances and water supplies and ask that the Operator clearly demonstrates consideration for the following:

- Stack heights over 4m are specified as loose triangular stacks, as the density of a stack changes the stacks ability for air flow.
- Consider how larger stockpiles are risk assessed, demonstrating they would require larger firebreaks/separation distances, greater water supply and suitable containment available to contain larger volumes of firewater.
- Evidence of how a greater amount of firewater would be contained on site, as more water increases the risk of failure to contain firewater, containing potentially polluting substances. Demonstrating that the sites FPMP recognises and addresses the greater risks associated with unprocessed wood posed by external heating sources.
- Evidence that the relevant Fire Group lead within the FRS has been approached by the Operator. If you need any assistance with this, please inform your regulation officer.

And when considering the practicalities of firefighting:

- The time to get out of hours staff to site, the time to set up equipment, and with FRS attendance, the availability of equipment such as high-volume pumps as this cannot be guaranteed in the event of a fire.
- If FRS equipment is unavailable, pumps on site could be used, however the capability of the pumps available need to be considered.
- Consider the likelihood of recirculation with a water tank that collects site run off and its potential impact on the sites strategy within the FPMP, i.e. consider how the tank is fed and how the gully has to be manually emptied using a pump and the potential for damage to pumps during an incident (waste type dependent).
- With recycled firewater, the concentration of contaminants increases. Therefore, show consideration for the suitability of any water supply available for crews and staff when using water available to them.

The information above has been provided to help the Operator moving forward. Thanks to all representatives of the Operator ‘South West Wood Products Ltd’ present and representatives from South Wales Fire and Rescue Service for their time and input during the inspection. A review of the sites FPMP will follow in the coming weeks.

Please address actions 1-6 and should you wish to amend the FPMP considering this report, please inform your regulation officer within 7 working days of receipt of this report, so any amendments can be made prior to review by NRW.

If you have any queries in relation to any of the information within this Compliance Assessment Report, please contact the sites regulatory officer in the first instance.

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.