

Compliance Assessment Report CAR_NRW0048322

Permit being assessed: CB3495FF.

For: Kings Dock, **held by:** South West Wood Products Limited

At: Swansea, Swansea, Swansea, SA1 8QT.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/04/2025 between 10:20 and 11:30.

Parts of permit assessed: Waste operations and FPMP.

NRW Lead Officer: David Ellar, accompanied by Jolene Lewis.

Report sent to: Tom Dunn, Regional Manager, on 21/05/2025.

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)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3G - Waste - Emissions and monitoring - Fire	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	

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?

No action required.

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

This was an announced, routine site visit made by David Ellar and Jolene Lewis of Natural Resources Wales (NRW). The purpose of the inspection was to assess compliance against Environmental Permit Number: EPR/CB3495FF, and to confirm actions detailed in a previous CAR (ref: CAR_NRW0045507) had been completed.

The weather was fine and dry.

NRW officers were met onsite by Martin Chubb, Tim Jackson, Rita Vassallo and Chris Chaney (SWWP) who also accompanied NRW officers around the site.

Before the inspection took place, all of the aforementioned had a discussion regarding the recent permit variation application, FPMP requirements and proposed new dust mitigation measures.

Previous inspections (Actions):

CAR_NRW0045507 for a site visit on the 17/10/2024 detailed a Category 3 noncompliance against compliance criteria W3G and permit conditions 3.5.1, and an action was identified. The action identified was:

'you must ensure that the waste is stored within the manner described under the current approved FPMP' (See CAR_NRW0045507 for full detail).

Improvements in waste storage were evident during this inspection, stack heights had been reduced and separation distances had been increased. It was also noted waste had been cleared from the designated quarantine area.

It was observed during our visit that waste was being stored in accordance with the current agreed FPMP (v1.5).

Permit breaches:

No permit breaches were observed during this visit.

Waste Operations (W2A, W2C, W2D & W2E):

Whilst on site the waste activities during the inspection were found to be in line with the condition 2.1.1 and table S1.1 of the permit. All wastes were stored within the boundary of the permit as required under condition 2.2.1. With no non-compliant wastes identified during the inspection as required under condition 2.3.2.

Emissions and Monitoring (W3B):

Whilst wood processing was not taking place at time of the visit to allow for a site visit to be undertaken, all dust prevention measures such as water cannons and bowzers were in place and ready to go. New dust cannons were on site and a contract was in place with a new supplier to supply a maintain them. The site are also in the process of amending the processing section of the site in an effort to further reduce dust emission risk, shipping containers will be used to create a working area (to create operational bunkers) which is hoped will prevent dust being blown off site. This is work in progress but is hoped to be finished soon, SWWP will submit photos of the operation to NRW when complete. If proved to be successful SWWP will amend the DEMP to reflect the changes to the operation. No dust issues were identified during this visit.

Photograph of new dust cannon:



Fire Prevention and Mitigation Plan (W3G):

Officers inspected the current stockpiles of unprocessed waste wood stored on site, the height of the stockpiles were found to be approximately 4m which is in line with the approved FPMP (version 1.5) agreement of 4m, This is an improvement and a reduction of height since our last site visit where stack heights were found in excess of 5m.

The large pile of green waste observed being stored on part of the quarantine area during our last visit had vastly decreased, there was some waste still present but this could be easily moved if required. The quarantine area should remain clear of waste so it can be used as a designated area to place fire affected waste if required. If you use the quarantine area to store material temporarily you should make sure you can remove those wastes as soon as is practicable. In the event of a fire, you must be able to remove those wastes

immediately, your FPMP should include details of the procedure you will use to do this.

Photograph of unprocessed waste wood storage:



Photograph of cleared quarantine area:



Thank you for your time during the inspection.

Ends.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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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.