

Compliance Assessment Report CAR_NRW0043194

Permit being assessed: GB3593HE

For: TRADE EFFLUENT TREATMENT @ BBH LTD, held by BURT BOULTON AND HAYWOOD LIMITED

At: BURT BOULTON & HAYWOOD LTD, ALEXANDRA DOCK, NEWPORT, GWENT, NP20 2WA.

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

On 16/01/2024, between 10:00 and 11:45.

Parts of permit assessed: Permit compliance

NRW Lead Officer: Elis Nuttall.

Report sent to: Ashleigh Weston, Technical & Regulatory Manager , on 11/09/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	C3 Minor (Suspended)	3.1.1 - There shall be no point source emissions to water except from the sources and emission points listed in schedule 3.
WQ-A1 - Water Quality - Management - General management	C3 Minor (Suspended)	3.3.3 - Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales.
WQ-D3 - Water Quality - Information - Notifications	C3 Minor (Suspended)	4.3.1(a) - Natural Resources Wales shall be notified without delay following the detection of: (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
		not controlled by an emission limit which has caused, is causing or may cause significant pollution.

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-C1	Undertake the necessary permit variation to reflect where the discharge/sample point is located.	18/03/2024
WQ-A1	Undertake an assessment of the condition of the jetty used to access the discharge point as it is degrading in places. Undertake appropriate repairs. 7.Undertake clearance of overgrown vegetation to ensure access to the discharge point is maintained.	Already completed
WQ-D3	Provide evidence of operational issues with treatment system between Aug and Dec 2023. Any maintenance works should be evidenced for NRW's benefit.	Already completed

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

Site Visit Report

This report details the site visit conducted on the 16/01/2024 to the trade effluent treatment system at Boulton and Haywood Limited (now trading as Scanpole Ltd.), permit reference number EPR-GB3593HE.

I (NRW Officer Elis Nuttall) attended Boulton and Haywood Limited (Scanpole Ltd.) at Alexandra Dock, Newport, Gwent, NP20 2WA for a permit compliance visit at 10:00 where I met with the Technical & Regulatory Manager. The weather was cold, dry and clear at the time of the visit.

*Note, due to the extended period between the visit and the issuing of this report (11/09/2025), all scores are suspended due to them either already being completed and confirmed by the operator, or due to it being an unreasonable score due to the time elapsed since this visit. Deadlines for remaining actions will not be enforced. Any ongoing

issues/actions will be reflected in a new CAR form for subsequent visits. NRW apologises for this delay.

Site Observations

This permit is for a water discharge activity of trade effluent consisting of site drainage and pumped groundwater into Alexandra Dock. Current and historic use of the site means that creosote is present and as a result treatment of effluent takes place via a lamella treatment system. The following consented limits are specified by the permit:

- Maximum daily discharge volume: 350 m³/day
- Maximum rate of discharge: 4 litres per second
- TPH: 50mg/l

The listed discharge and sample point is listed at ST 31388 85810.

It is noted that prior to my visit, only one compliance record is present, contacted by NRW on 01/07/2015 (CAR_150701). No breaches were recorded; however the reviewing of operating techniques documents were requested in addition to establishing a compliance results reporting scheme. From NRW's records it is unclear if these advisory comments were ever actioned or completed.

Site Infrastructure

As this was my first visit to site I conducted an office meeting with the Technical & Regulatory Manager to discuss the general running and maintenance of the site. It was noted that no discharges were made from site between August 2023 and December 2023 due to faults with the on-site treatment system. All wastewater was collected in IBCs and disposed of by a registered waste carrier and all waste transfer notes were kept. I requested that a copy of the maintenance records and transfer notes be made available for review. Due to no discharges being made for a period of ~5 months, water quality sampling (undertaken by RPS) was conducted by sampling from the pre-treated effluent storage tank; it was stressed that this effluent was not discharged to Alexandra Docks. Evidence will be provided of this sampling by the Technical & Regulatory Manager. The treatment system and discharge are now operational again as of December 2023.

It was noted that the onsite flow meter breaks regularly, but flow monitoring is undertaken by their servicing contactor (TT Pumps). They are subsequently looking to change servicing contactor. I will provide the list of accredited drainage servicing companies compiled by British Water for reference.

Maintenance of the drainage system on site is contacted to GD Environmental. I have requested an example report.

General site conditions were observed on the production yard. The site was generally clean with no excess debris or mud present on haulage roads as seen in Figure 1. I was noted that road sweepers are deployed periodically when needed to ensure roads are kept clear of excessive mud.



Figure 1 – Site visit photo: A representative view of site conditions at the time of the visit.

During the site walkover, approximately oil drums and one IBC were observed stored in the open on a wooden pallet as seen in Figures 2 and 3. On inspection, it was found that the drums contained solid waste only that was contaminated with creosote e.g. rubber gloves, paper towels, plastic packaging. This is seen in Figure 4. The IBC contained liquid waste contaminated with creosote. There was no containment in place to mitigate against any accidental spills or to prevent any wastes entering the site drainage network. I advised that all wastes should be stored on impermeable bases with containment measures (e.g. bunding with 110% capacity) to ensure no accidental spills lead to an environmental pollution incident. The Technical & Regulatory Manager agreed with this statement and ensured that they would relocate the wastes to a more appropriate location as soon as practicable.



Figure 2 (above) and Figure 3 (below) – Site visit photo: Drums and IBC observed on site.



Figure 4 – Site visit photo: The contents of the oil drums being used to store contaminated solid wastes prior to disposal offsite.



Figure 5 – Site visit photo: The onsite silt buster which was operational at the time of the visit.

The site drainage infrastructure was inspected, with the silt buster in operation at the time of the visit, as seen in Figure 5. The pre-treated effluent storage tank was holding water but there was little input at the time of the visit, as seen in Figure 6. No issues were noted regarding operations or maintenance since the system was reinstated to full usage in December 2023. It was noted that the system is serviced and jetted/cleaned as needed by GD Environmental, with the last routine maintenance visit being in “Summer 2023”. I have requested a copy of maintenance and servicing records for the system.



Figure 6 – Site visit photo: Pre-treated effluent tank holding water at the time of the visit.



Figure 7 – Site visit photo: The discharge point at the time of the visit.

The discharge point was checked, with access being ok but the route was via a wooden jetty that was rotten and missing planks in sections. It was noted as a H&S concern and

advised that improvements could be made. Additionally, there was overgrown vegetation restricting a clear route to the discharge point. The discharge was active at the time of the visit but was very minimal with the visual composition appearing clear as seen in Figures 7 and 8.



Figure 8 – Site visit photo: The discharge point and the effluent being discharged at the time of the visit.

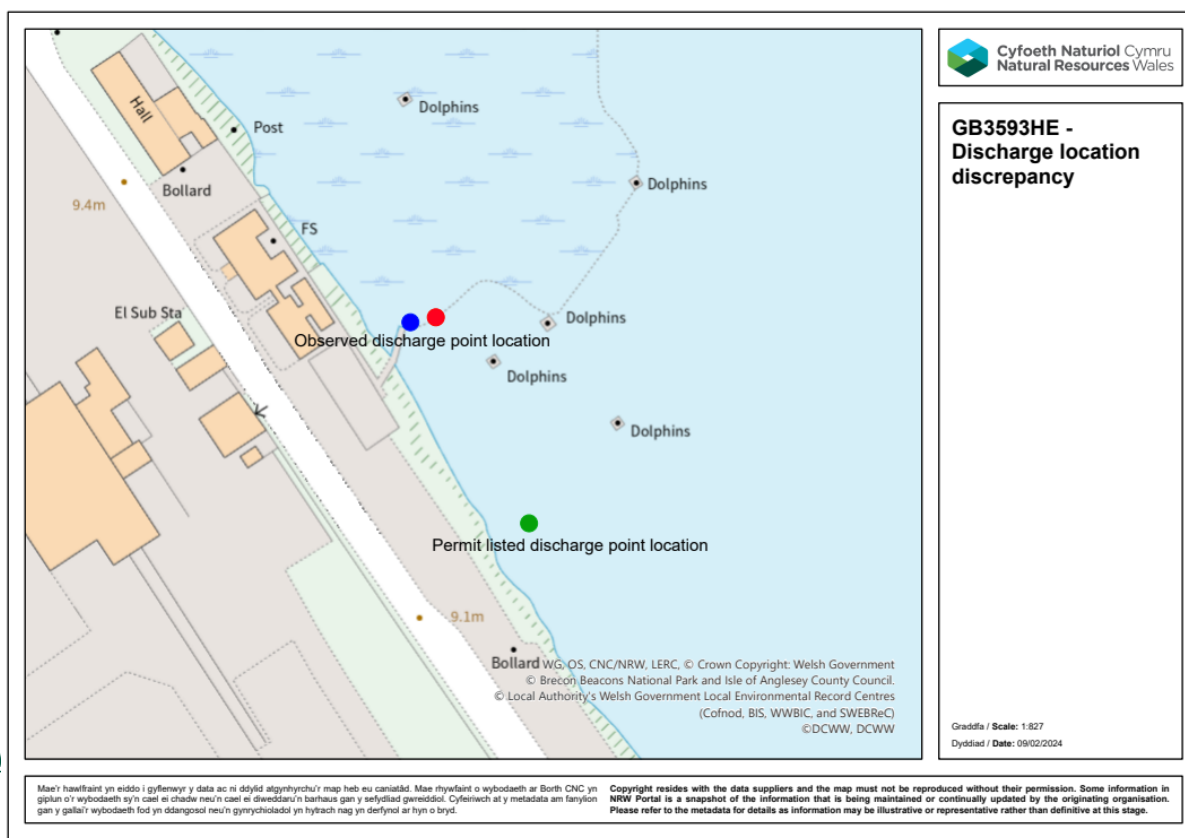


Figure 9 – Map: Location of the observed discharge point (red marker, amended to blue marker via mapping confirmation) and the location listed in the permit (green marker) as discussed above.

On site the discharge point was calculated to be located at ST3137085850, amended to ST3136585849 on checking satellite imagery. This location is ~45m North of the discharge point location stated in the permit (ST313885810). This is seen in Figure 9.

I stated that this issue may need a permit variation to address the discrepancy. It is vital that accurate information is available regarding discharge points within permits in the event of a high level/sever incident where these locations will need to be identified, potentially without the presence of site operators. I will provide information to the Technical & Regulatory Manager on how this is achieved. This was discussed at length on returning to the site office, with further mapping checks confirming the issue.

A brief discussion on general observations and permit review was undertaken with no further major concerns being identified.

I left site at 11:45.

Breaches of permit condition:

Below are the permit breaches that were identified during the site inspection.

1. PERMIT CONDITION 3.1.1 – Emission point of discharge **(Suspended)**

There shall be no point source emissions to water except from the sources and emission points listed in schedule 3.

Justification: The location of the permitted discharge point (as noted in S3.2) and permitted monitoring point (as noted in S3.3) are not located at the listed location in the permit. The points are located ~45m further North at ~ ST3136585849 (see Figure 9 above).

2. PERMIT CONDITION 3.3.3 – Access to sampling/monitoring points **(Suspended)**

Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales.

Justification: The access was slightly limited at the time of the visit due to the aging condition of the jetty (that was rotten and missing planks in sections) needed to access the sampling/monitoring point. Additionally, there was overgrown vegetation restricting a clear route to the discharge point.

3. PERMIT CONDITION 4.3.1(a) – Notification of malfunction/breakdown
(Suspended)

Natural Resources Wales shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.

Justification: It was stated that the onsite treatment system failure was detected in August 2023 with no treatment or discharges being undertaken until December 2023. Natural Resources Wales were not notified of this failure, only becoming aware of the issue during the site visit on the 16/01/2024.

Action required by dates specified:

1. Provide all reporting data records (RPS sampling data and flow monitoring data) for the period since the issuing of the permit (02/03/2015).

Deadline: Already Completed

2. Provide an up to date copy of the site's management system.

Deadline: Completed

3. Provide evidence of operational issues with treatment system between Aug and Dec 2023. Any maintenance works should be evidenced for NRW's benefit.

Deadline: Completed

4. Provide evidence of waste transfer notes for the disposal of effluent whilst treatment system was not operational (Aug-Dec 2023)

Deadline: Completed

5. Provide an example of GD Environmental's maintenance report for site drainage and treatment system

Deadline: Completed

6. Undertake an assessment of the condition of the jetty used to access the discharge point as it is degrading in places. Undertake appropriate repairs.

Deadline: Completed

7. Undertake clearance of overgrown vegetation to ensure access to the discharge point is maintained.

Deadline: Completed

8. Undertake the necessary permit variation to reflect where the discharge/sample point is located.

Deadline: N/A

Other advisory comments:

1. Ensure that waste drums and IBC containing solid and liquid wastes are stored within a bunded area with 110% capacity. Provide evidence that this has been actioned/undertaken.

Deadline: Completed

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: Elis Nuttall, Environment Officer, elis.nuttall@cyfoethnaturiolcymru.gov.uk, 03000 65 4651.

Thank you,

Elis Nuttall.

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.