

Compliance Assessment Report CAR_NRW0049596

Permit being assessed: AN0395201

For: ABP BULK CARGO NORTH SIDE SOUTH, held by ASSOCIATED BRITISH PORTS
At: ABP BULK CARGO, NORTH SIDE SOUTH DOCK, ALEXANDRA DOCK, NEWPORT, NP20 2UW.

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

On 09/09/2025, between 13:34 and 14:28.

Parts of permit assessed: Site operations and infrastructure

NRW Lead Officer: Elis Nuttall.

Report sent to: Christine Nelson, Environment Manager, on 14/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-D2 - Water Quality - Information - Reporting	C4 No impact	1.8.1(a) - Recording and reporting
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D1 - Water Quality - Information - Records	Action only (X)	
WQ-D2 - Water Quality - Information - Reporting	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WQ-D2	Provide NRW with a copy of the site's maintenance programme for the infrastructure in place (silt buster, pump, oil and silt separator, sample point).	28/10/2025
WQ-D1	Provide NRW with a copy of the site's drainage plan for future reference.	Already completed
WQ-D1	Provide NRW with a copy of the site's maintenance records for the infrastructure in place.	Already completed
WQ-D1	Provide NRW with the waste transfer notes for the de-sludge conducted on the 09/05/2025 as evidence of completion and appropriate disposal.	28/10/2025
WQ-D2	Provide NRW with the maintenance details of the pump failure that occurred in 2024 and a record of actions taken as evidence of effective operation and management.	28/10/2025

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 made by Natural Resources Wales (NRW) on the 09/09/2025 to Associated British Ports (ABP) Bulk Cargo, permit reference number EPR-AN0395201.

I (NRW Environment Officer Elis Nuttall) attended ABP Bulk Cargo, Alexandra Docks, Newport at 13:34 for a water quality permit compliance inspection where I met with ABP's Environment Manager (Wales & Short Sea Ports) (CN). The weather was clear and dry during this visit.

General Observations

This site is an active cargo port located on Alexandra Docks, Newport. The permit consents the discharge of trade effluent consisting of wash-down water from an oil and silt separator on a designated impermeable area. This infrastructure is used to clean site plant and vehicles.

The discharge shall be made via an outlet to the Afon Ebbw at ST3100284649 and a sample point should be provided and maintained at ST3149284770. The discharge limits specified in the permit are as follows:

- Discharge volume: 5m³/day
- Suspended solids: 40mg/l
- Oil and/or grease: No significant visible trace
- Detergents: The discharge shall not contain detergents

The site was operational at the time of the visit, although no wash-down activities were taking place.

Initial Discussion

This was the first compliance visit for the site by NRW since the permit was issued in 2006. As such, I began the inspection by discussing the site's history and operations with CN. The drainage layout for the washdown area was explained and consists of a straight forward surface water line that connects into the wider port sewer network which

discharges via the outfall to the Afon Ebbw. Whilst I viewed the plan digitally, I requested that a copy be shared with NRW for future reference (actioned below).

ABP do not undertake any flow volume or effluent quality monitoring (not a permit requirement) but it was stated that this is an operational aspect they are looking to implement in future as part of improvement programmes. This will be considered on a country wide basis once the permit requirements for each site are assessed.

I requested to see a copy of the maintenance programme for the site infrastructure (silt buster, pump, oil and silt separator, sample point) but this was not available to view at the time of the visit. This is a breach of permit condition 1.8.1(a) and has been reflected (with justification) in the breach list. I have actioned that a maintenance programme be provided to NRW below. Maintenance records were also requested which I was able to view digitally during the visit, although I have actioned for a copy to be shared with NRW for records purposes. All routine and non-routine actions are recorded, including emptying and de-sludge work, the last instance being undertaken on the 09/05/2025. I requested a copy of the waste transfer notes for this cleaning work as evidence of completion and appropriate disposal. See the actions list below for further details. CN stated that the infrastructure has not required any periods of extended shut down due to non-routine actions.

We then proceeded to inspect the site infrastructure.

Site Infrastructure

The wash-down area is located in the vicinity of ST3148284756. General site conditions were good at the time of the visit with the concrete pad in place and no sign of overspilling or residual oil/grease present. This is seen in Figure 1.



Figure 1 – General site conditions at the time of the visit.

CN explained that all effluent from the sump/separator are pumped into an onsite silt buster (Figure 2) for treatment prior to discharge via the sample point. The sump/separator was observed and was seen to be capturing untreated effluent, with sufficient capacity remaining. It was noted that automatic pumping is in place through the use of a float switch. See Figure 3 as evidence of these observations.



Figure 2 – The silt buster as observed during the visit.



Figure 3 - The sump/separator conditions as observed during the visit.

The pump was not in operation at the time of the visit so an assessment of its operational effectiveness could not be made. The maintenance records show a new pump was installed in 2022, with a record that it experienced a failure in 2024 causing puddling of water in the wash-down area. It is not evident when this issue was resolved. Please provide the maintenance details for the remedial works undertaken and any subsequent maintenance records as evidence that the pump is working effectively. This is actioned below.

The treated discharge enters the surface water drain via a pipe at ST3148884778 (corrected to ST3148784772 while assessing aerial photos/mapping). It was noted that this was also the site's consented sample point. This chamber was completely accessible at the time of the visit. Whilst not in the exact permitted NGR location, it is within 5 meters of the listed point and given the presence of the pipe inserted into the drain (as seen in Figure 4) I am happy to accept that no confusion would be caused by this minor discrepancy and that the sample point location is compliant with the permit.



Figure 4 – The sample point as observed during the visit.

Whilst there was no discharge occurring at the time of the visit, I requested that the sample point grate and pipe be removed so that a visual inspection of the chamber could be conducted. As is evidenced in Figure 5, the chamber was clear of any oil or grease residue, with a very minimal amount of clear water pooling in the pipework. I noted the presence of some stone and aggregate within the pipe, which CN stated they have never

addressed as no issues associated with capacity or overflowing from the chamber has occurred. While it cannot be proved that this stone originated from ABP's operational areas (given the interconnected nature of the wider port surface water system encompassing numerous different operators and sites) I advise that the stone build up is assessed and addressed to ensure it does not cause any issues in future. This is outlined in the advisory comments below.



Figure 5 – The sample point chamber as observed during the visit.

The discharge point could not be observed at the time of this visit due to it being located in an estuarine environment and H&S considerations (both from NRW and ABP) concluded it could not be accessed safely. However, access to the discharge point is not a permit requirements so I was content not to inspect it during this visit.

No further observations were made during this visit.

Final Discussion

I outlined my observations and actions to CN who raised no further questions.

I left site at 14:28.

Breaches of permit conditions:

1. CATEGORY 4 BREACH – PERMIT CONDITION 1.8.1(a) – Recording and reporting

The Consent Holder shall establish and operate a documented maintenance programme and record all non-routine actions undertaken that may have adversely affected effluent quality. Copies of the programme shall be made available for inspection by the Agency's officers at all reasonable times.

Whilst maintenance records were observed and provided, the site could not provide any structured maintenance programme outlining the maintenance required to ensure continued operational effectiveness. As such I have scored this as a C4 (a non-compliance which has no potential environmental effect) breach.

Please see report content for further justification and the action to rectify the breach below.

Actions required by dates specified

1. Provide NRW with a copy of the site's drainage plan for future reference.

Deadline: Already completed.

2. Provide NRW with a copy of the site's maintenance programme for the infrastructure in place (silt buster, pump, oil and silt separator, sample point).

Deadline: 28/10/2025.

3. Provide NRW with a copy of the site's maintenance records for the infrastructure in place.

Deadline: Already completed.

4. Provide NRW with the waste transfer notes for the de-sludge conducted on the 09/05/2025 as evidence of completion and appropriate disposal.

Deadline: 28/10/2025.

5. Provide NRW with the maintenance details of the pump failure that occurred in 2024 and a record of actions taken as evidence of effective operation and management.

Deadline: 28/10/2025.

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.

Other advisory comments

1. Assess the build up of stone and aggregate within the sample point chamber and take any actions deemed necessary to ensure no issues arise from its presence.

*Please note that this is not an action. No updates will be requested.

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.