

Compliance Assessment Report CAR_NRW0049598

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 11/09/2025, between 10:05 and 11:25.

Parts of permit assessed: Site operations and infrastructure

NRW Lead Officer: Elis Nuttall.

Report sent to: Ashleigh Weston, Technical & Regulatory Lead, on 23/10/2025.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
WQ-B2 - Water Quality - Operations - The site	Ongoing (O)	3.1.1 - Emissions to water
WQ-B1 - Water Quality - Operations - Permitted activities	C4 No impact	3.3.1(a) - Monitoring
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-C1 - Water Quality - Emissions and monitoring - Emissions to water	Action only (X)	
WQ-A1 - Water Quality - Management - General management	Action only (X)	
WQ-A1 - Water Quality - Management - General management	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-B2	Begin the permit variation process to change the location of the listed discharge/sample point. Assistance in doing this can be provided by NRW.	23/11/2025
WQ-B1	Undertake the planned flow meter maintenance (12/09/2025) and provide evidence of its completion and effective operation to NRW.	06/11/2025
WQ-A1	Provide a copy of the site's management system to NRW for reference.	06/11/2025

Criteria	Action needed	Complete by
WQ-C1	Provide a record of effluent quality monitoring for the past 12 months.	Already completed
WQ-C1	Provide a record of discharge volumes and rates for the past 12 months. I note that due to maintenance issues with the flow meter these records may be incomplete.	06/11/2025
WQ-A1	Provide evidence (via a waste transfer note) for the most recent emptying of the treatment system.	Already completed
WQ-A1	Provide details on the maintenance and calibration of the high level alarm system.	06/11/2025

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 11/09/2025 to Scanpole Ltd (referred to as Burt Boulton & Haywood Ltd in the permitting documents), permit reference number EPR- GB3593HE.

I (NRW Environment Officer Elis Nuttall) attended Scanpole Ltd at Alexandra Docks, Newport, NP20 2WA for a water quality compliance inspection at 10:05 where I met with the Technical & Regulatory Lead (AW). The weather was wet with intermittent rain during the visit.

General Observations

The permit was issued in March 2015 and regulates a maximum discharge of trade effluent consisting of site drainage and pumped groundwater from a timber yard. Due to historic use, the site has creosote present, and therefore treatment of the site drainage is required prior to discharge. The effluent is treated using a lamella treatment system before discharging into Alexandra Dock.

The permit states that the discharge shall be made via an outlet to Alexandra Dock at ST3138885810. This location is also listed as the site's permitted effluent sample point. The discharge limits listed are as follows:

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

The site was operational at the time of the visit.

Initial Discussion

This was the second compliance visit to this site, the previous (and first) one being conducted in January 2024. I began this visit by running through the actions set in the previous visit, the majority of which were completed within the required timeframes. The only outstanding action was to vary the permit to change the permitted discharge point NGR to reflect the reality of the location on site. Due to a delay in issuing the previous report I am happy to roll this action onto this subsequent report. Details of this action are outlined below.

Regarding current site drainage operations, it was stated that no major changes to site working practices have occurred since the previous visit, with the only change being the forthcoming installation of an air cleansing system for the production site. This change will not impact the site drainage arrangements.

The management system was available to view on site and was fit for purpose. I requested to view and observed updated effluent quality records which displayed compliance with the permitted limits. A copy of these of these have been requested for our records and are listed below.

The only issue noted was the continual flow meter maintenance and replacement requirements due to ongoing failures of the flow meter experienced. It was stated that maintenance to resolve the issue was being undertaken on the 12/09/2025. While the site has been proactive in its efforts to resolve this issue, the lack of permanent monitoring of the discharge rate and volume is a breach of condition 3.3.1(a)(monitoring). Details and remedial actions on this are outlined below. I requested any flow monitoring records available, although I understand these will be incomplete.

No further questions were raised at this stage of the inspection so we proceeded to assess the site infrastructure.

Site Infrastructure

We began the infrastructure inspection by assessing the effluent treatment system which comprises of a series of silt buster units. General site conditions were good, with all access points clear of obstructions and all components free of excess dirt and oil/grease. No pooling of water/effluent (treated or otherwise) was observed. These observations are evidenced in Figure 1.



Figure 1 – The general site conditions as observed during the visit.

The treatment system infrastructure was observed, the conditions of which are seen in Figures 2 and 3 below. The system was running at the time of the visit with all pumps and systems seemingly operating as designed. The entire system is bunded, with a cleaning regime in place as observed in the site's management system. The system was last emptied in August 2025, evidence of which I requested in the form of waste transfer notes (actioned below). The final effluent was clear of any significant trace of pollutants and was flowing towards the final effluent chamber. My only observation is to note the presence of deposited oil/grease on the channel walls which can be seen in Figure 3. An advisory comment to review cleaning regimes has been noted to reflect this.



Figure 2 – The treatment system as observed during the visit.



Figure 3 – The treatment system as observed during the visit. Note the presence of minor oil/grease build up on the channel walls.

All treated effluent is discharged via a final effluent chamber. The chamber was observed during the visit (Figure 4), with the effluent appearing clean and displaying no perceivable odours at the time of the visit. A high level alarm was in place, of which details of maintenance and calibration are requested, although there was sufficient capacity at the

time of the visit. No further issues were observed.



Figure 4 – The final effluent chamber as observed during the visit.

As on previous inspections, the actual discharge point is not located in the listed location, however this has been noted and an action to vary the permit has been set (see below). For reference, the true location of the discharge (NGR) is ST3136285847. This is evidenced in Figure 5.

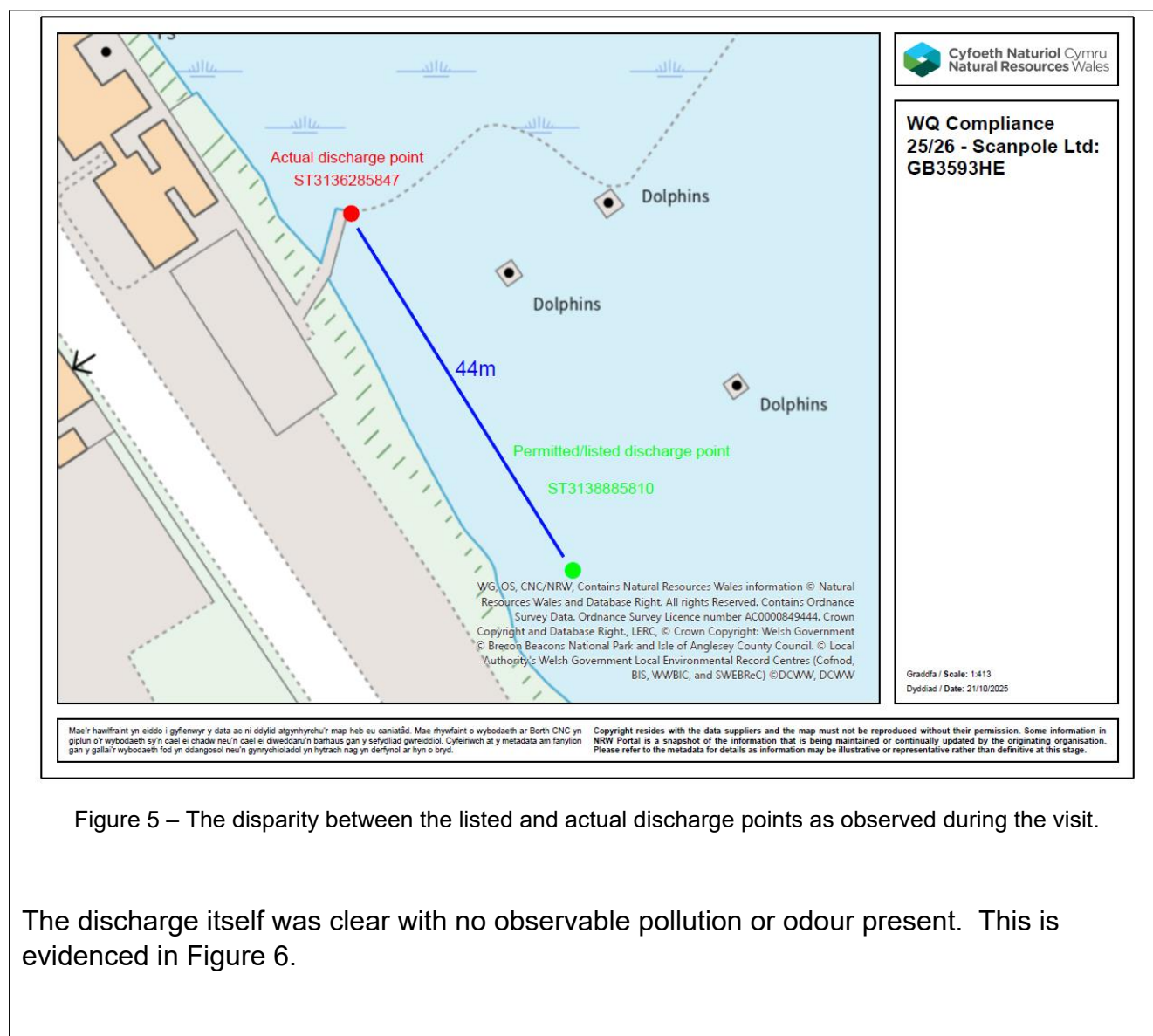




Figure 6 – The discharge point as observed during the visit.

While access to the discharge point was compromised during the previous inspection, with overgrown vegetation present and H&S concerns regarding the decking condition, this has been rectified by the operator. The access route is now safe and fit for purpose, as seen in Figure 7.



Figure 7 – The access route to the discharge point as observed during the visit.

No further observations were made during this inspection. We returned to the site office for final discussions.

Final Discussion

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

I left site at 11:25.

Breaches of permit conditions

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

1. ONGOING NON-COMPLIANCE (Not scored) – PERMIT CONDITION 3.1.1 – Emissions to water

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

The permitted listed location for the discharge and sampling point (ST3138885810) does not reflect the true location (ST3136285847). An action to vary the permit to reflect this is listed below.

Please see report content for further justification

2. CATEGORY 4 BREACH – PERMIT CONDITION 3.3.1(a) – Monitoring

The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- a. *point source emissions specified in tables S3.1 and S3.3.*

Due to continual failures of flow monitoring infrastructure, the continuous monitoring and recording of discharge volume has not been undertaken. Due to this being a management/maintenance issue I am happy to issue a C4 (no environmental impact) breach at this time to reflect the site's proactive measures to resolve the issue. The action details below reflect this.

Please see report content for further justification

Actions required by dates specified

1. Begin the permit variation process to change the location of the listed discharge/sample point. Assistance in doing this can be provided by NRW.

Deadline: 23/11/2025

2. Undertake the planned flow meter maintenance (12/09/2025) and provide evidence of its completion and effective operation to NRW.

Deadline: 06/11/2025

3. Provide a copy of the site's management system to NRW for reference.

Deadline: 06/11/2025

4. Provide a record of effluent quality monitoring for the past 12 months.

Deadline: Already completed

5. Provide a record of discharge volumes and rates for the past 12 months. I note that due to maintenance issues with the flow meter these records may be incomplete.

Deadline: 06/11/2025

6. Provide evidence (via a waste transfer note) for the most recent emptying of the treatment system.

Deadline: Already completed

7. Provide details on the maintenance and calibration of the high level alarm system.

Deadline: 06/11/2025

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. Review the cleaning regime of the treatment system to assess the need to address the minimal build-up of oil/grease observed on the channel walls. Note this is not an action and 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.