

Compliance Assessment Report CAR_NRW0037184

Permit being assessed: RP3295FS.

For: G D Environmental Services Ltd, held by G D Environmental Services Ltd

At: East Bank Road, Felnex Industrial Estate, Newport, Gwent, NP19 4PP.

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

On 01/12/2020 between 10:30 and 11:30.

Parts of permit assessed: A / B / C / D / F / G

NRW Lead Officer: Greg Gardner, accompanied by Alex Bowder.

Report sent to: Oliver Hazell and Mark Williams, Technically Competent Manager on 14/12/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	C3 Minor	1.1.1
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
C1 - General Management - Staff competency/training	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
1	4

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
C2	Reduce size of waste stockpile to 4 metres or less and establish clear separation distances between deposited waste and site boundaries. Send NRW officers most current / up to date version of GD Environmental, Newport FPMP (Fire Prevention and Mitigation Plan)	25/01/2021
B1	Improve conditions of concrete flooring, where damage has occurred, to prevent leeching of contaminants to groundwater	15/03/2021
C1	Please send a copy of Oliver Hazell WAMITAB certificate to NRW officers	30/12/2020
C4	Reduce size of waste stockpile to 4 metres or less and establish clear separation distances between deposited waste and site boundaries.	25/01/2021

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

This report details the site visit made on the 1st December 2020 to GD Environmental, permit reference number EPR-RP3295FS.

Officers Alex BOWDER and Greg GARDNER attended the GD Environmental site at Unit 11, East Bank Road, Newport, NP19 4PP for a routine site inspection at 10:30am where we met with Oliver HAZELL (Delegated TCM) and Mark WILLIAMS (Site Manager) along with two other GD Environmental employees. The weather was dry, bright and reasonably cold which it had also been the previous day.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

PERMIT COMPLIANCE - BREACHES

CATEGORY 3 BREACH – PERMIT CONDITION 1.1.1

(C2) – GENERAL MANAGEMENT – MANAGEMENT SYSTEM AND OPERATING PROCEDURES

“In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints”

- Stockpiles of general waste, containing RDF, higher than 4 metres
- Stockpile of waste without established separation distance to site boundary

Please see report content for further justification

PERMIT HISTORY

See below extract from permit regarding variation history.

Status log of the permit

Description	Date	Comments
Permit determined EAWML 30387	19/09/06	Original licence issued to GD Environmental Services Ltd.
Variation determined EPR/RP3295FS/V002 formerly EAWML 30387	01/05/13	Variation to add waste code 10 01 03
Variation determined EPR/RP3295FS/V003	03/07/13	Variation to increase annual throughput to 74,999 and increase the permitted boundary
Application EPR/RP3295FS/V004	Duly made 13/05/16	Variation application to increase the permitted boundary.
Variation determined EPR/RP3295FS	14/06/16	Varied permit issued to GD Environmental Services Ltd.

GENERAL OBSERVATIONS

GD Environmental operate under a Tier 2 Bespoke environmental permit based on standard rule set SR2010_No12. This site is used as a waste transfer station with treatment prior waste being distributed to other companies / sites within the UK. The site was in operation at the time of the visit with numerous lorries / heavy machinery carrying out waste operation activities. No waste of any type was stored outside of the permit boundary apart from empty metal skips. There were numerous piles of wooden pallets stored on site underneath a corrugated roof outbuilding. The impact of COVID-19 as well as the recent Welsh COVID-19 restrictions such as the 'fire-break' have resulted in stockpiles of waste being considerably higher than usual. There was a pest / scavenger deterrent system in operation at the time of inspection which seemed to have a positive effect in keeping pest / scavengers at bay.

WASTE TYPES**General Waste**

Predominately located on this site were numerous piles of general waste which at the time of the visit, in some areas, were steaming (see photo 1). The waste is on site, averagely, for 4-6 weeks before being sorted and then transported to Viridor in South Wales. There was high amounts of RDF (Refuse Derived Fuel) waste on site. The RDF was then sorted and transferred off site to another site for burning for energy. Officers highlighted to staff that this stockpile was slightly higher than the 4 metre height restriction as detailed in the FPMP guidance.



Photo 1 - Stockpiles of general waste prior to sorting.

Scrap Metal

There was a limited amount of scrap metal on site. This was again sorted and segregated from the rest of the waste by hand and by magnets located on the mechanical trommel. This waste is then transported off site to various scrap metal dealers dependant on current pricings / market values

Plastics

Plastic waste was sorted then baled (see Photo 1 below) and then sent to Siteserv Recycling for further processing. There was a stockpile of plastic waste that was segregated and baled ready for transfer for further processing.



Photo 2 - Baled plastic waste to left of photo

Wood

There were quite a few stockpiles of wood located on site, notably underneath an electrical pylon that was located within the centre of the site (see photo 2). This wood would eventually be transported to South Wales Wood for further processing.



Photo 3 - Wood segregated into stockpiles located close to electrical pylon

ACTION: Provide information on what the contingency plans for site are if waste streams, the GD Environmental supply to, are closed down for prolonged periods of time.

FPMP

The FPMP (Fire Prevention and Mitigation Plan) guidance represents the minimum appropriate measures required to be put in place by operators to ensure that fires are prevented. The FPMP guidance sets the maximum storage height of stockpiled waste to four metres. This height specification was determined by the FRS (Fire and Rescue Service) for general management practise and stability, to enable the FRS to tackle a fire on site if an incident were to occur.

Your Environmental Management System (EMS) states the following regarding fire...

"5.2.1 No waste will be burnt on site. In the event of a fire occurring on site the operator will exercise his judgement and extinguish the fire with a suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to NRW on the working day that they occur and will be confirmed in writing by letter within 3 working days. All persons will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a licensed waste management facility."

Officers raised concerns regarding one stockpile in particular of combustible material (wood) was located underneath an electrical pylon (see photo 7). Any potential sparks from the electrical pylon or if the combustible material located underneath the pylon caught fire the consequences would be significant. All waste must be at least 6 metres from any potential ignition sources. The site operators stated that they have had a fire officer to site to risk assess the storage of combustible waste in close proximity to an electrical pylon and

the fire officer deemed the storage of this material acceptable.



Photo 7 - Stockpile of combustible waste located in close proximity to electrical pylons

NRW have contacted the South Wales Fire and Rescue Service (SWFRS) regarding the storage method of combustible material under electrical pylons. Going forward, NRW intend to conduct a joint visit with the SWFRS to assess and clarify whether the storage of this material mitigates the risk of fire.

ACTION: Provide a current FPMP (Fire Prevention and Mitigation Plan) for GD Environmental, Newport that complies with current NRW FPMP guidance which can be found on NRW's external website or please also see attachment on email sent from NRW following the issue of this CAR form.

DRAINAGE AND INFRASTRUCTURE

During the time of the visit it was noted to NRW officers that GD Environmental have an interceptor drainage system that is currently operational with no issues and is checked / maintained on an ad-hoc basis (typically every 6 months). When cleaned, the discharge travels to a foul sewer. This information must be documented with the site EMS (Environmental Management System).

The flooring infrastructure, where generally for the site was in good condition, had some few exceptions where this could be maintained or even improved due to the concrete cracking. This not only poses a potential risk of contaminants leeching to ground but also a health and safety hazard (see photo 4).



Photo 4 - Concrete flooring at GD Environmental requiring attention

ACTION: Provide action plan for infrastructure repair work for concrete flooring on site following the issue of this CAR form.

ACTION: Provide up to date / most recent EMS (Environmental Management System) to NRW officers following the issue of this CAR form.

WASTE STORAGE

At the time of the visit there were numerous large stockpiles of waste located throughout the site consisting of soils, wood and general household waste. This waste was being stored before being processed, via a trommel and then segregated before being transferred off site. Officers asked staff their procedures for when hazardous waste (such as asbestos) arrives at site. The operator stated that they isolate, segregate and treat accordingly before being removed from site.

It was noticed by NRW officers that the height of the stockpiled waste exceeded the recommended FPMP (Fire Prevention Mitigation Plan) guidelines of 4 metres (see photo 5). There was also a stockpile of waste fines (see photo 6) located within 1 metre of the site boundary.



Photo 5 - Stockpile of waste exceeding FPMP guidelines of 4 metres



Photo 6 - Stockpile of waste within 1 metre proximity of site boundary

Due to the size of the site with regards to operational activities, it is paramount that the operator is in control of its waste management and stockpile sizes. A site needs to have a designated quarantine area which is large enough to store 50% of the largest stockpile. The location of this quarantined area should be clearly detailed in your EMS and FPMP. This can be dynamic however it needs to be an established area at all times.

ACTION: Ensure all waste stockpiles are no more than 4 metres high following the issue of this CAR form.

WASTE SEPARATION ACTIVITIES

During the site visit a tour of the waste separation operation took place. The waste was being placed at the start of the process via a heavy machinery 'grabber' which placed the mixed waste onto the trommel. This would move the waste along a conveyor belt to remove 'fines'. These fines were then WAC tested (Waste Acceptance Criteria) for suitability for upcycling or if not suitable then were sent to landfill. The larger waste was then separated by hand by GD Environmental employees into different, separated waste skips ready for transfer (see photos 8, 9 and 10).



Photo 8 - Heavy machinery 'grabber' placing waste on trommel prior to being separated



Photo 9 - Conveyor belt with various wastes which were separated by hand



Photo 10 - Separate waste segregation bays at end of waste separation process

STAFF COMPETENCY

It was noted during the visit the Oliver Hazell, is currently in compliance with his WAMITAB (Waste Management Industry Training and Advisory Board) qualification. Checking NRW records we do not have a copy of this certificate on file.

ACTION: Please send an copy of your WAMITAB certificate to NRW officers following the issue of this CAR form.

WASTE RETURN DOCUMENTS

We currently have your latest submission of waste return data which indicated that you accepted 11,128 tonnes of waste material and you removed 8,212 tonnes of waste material for Q3 2020.

Waste Return Submission Deadline

Quarter	Period	Deadline
1	1 January to 31 March	30 April
2	1 April to 30 June	31 July
3	1 July to 30 September	31 October
4	1 October to 31 December	31 January

ACTION: Please ensure all recent / up to date waste return data is submitted to NRW by the specified deadlines as indicated in the above table.

NRW officers Alex BOWDER and Greg GARDNER left site at 11:30am.

I look forward to working with the site in future.

If you have any issues with this report please contact Greg Gardner on greg.gardner@naturalresourceswales.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales

(Establishment) Order 2012

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.

What are suspended scores?

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 Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

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.