

Compliance Assessment Report CAR_NRW0037686

Permit being assessed: QB3093HE.

For: Alexandra Docks, held by South West Wood Products Limited

At: East Way Road, Newport, NP20 2NP.

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

On 11/02/2021 between 10:20 and 10:50.

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

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

Report sent to: Jon Boland, Technically Competent Manager on 03/03/2021.

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
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B2 - Infrastructure - Closure and decommissioning	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)	
C1 - General Management - Staff competency/training	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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	Assessed (A)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
and Reporting - Monitoring of emissions and environment		
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 wood stockpiles to 4 metres or less as indicated within your FPMP and following NRW FPMP guidance.	31/03/2021

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 11th February 2021 to South West Wood Products, Newport, permit reference number EPR-QB3093HE.

Officers Alex BOWDER and Greg GARDNER attended the South West Wood Products site at Alexandra Docks, East Way Road, Newport, NP20 2NP for a routine site inspection at 10:30am where we met with Mr. John BOLAND (Technically Competent Manager). The weather was dry, 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 wood waste, higher than 4 metres
- Repeat occurrence from previous site inspection

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 issued EPR/PB3333DH (EAWML 400181)	17/10/13	Tier 3 bespoke permit for a waste transfer station for the storage and bulking up of wood waste for onward transport issued to Bowergy B V.
Variation determined EPR/PB3333DH/V002	15/10/14	Varied permit to include storage of RDF and increase the throughput to 140,000 tonnes a year.
Transfer determined EPR/QB3093HE/T001	05/03/15	Full transfer of permit to South Wales Wood Recycling Limited complete.
Variation determined EPR/QB3093HE/V002	20/05/15	Varied permit to treat waste wood for recovery prior to being transported off site issued
Part Transfer determined EPR/QB3093HE/T003	22/01/18	Part transfer from South Wales Wood Recycling Limited to Associated British Ports issued (EPR/AB3699FY)
Transfer determined EPR/QB3093HE/T004	08/11/18	Transfer of permit in full to South West Wood Products Limited.
Variation determined EPR/QB3093HE/V005	07/05/19	Varied permit to increase throughput to 150,000 tonnes per annum and to add EWC codes 19 12 02 and 19 12 03 The permit was also consolidated
Application EPR/QB3093HE/V006	Duly made 31/05/2019	Operator led variation to add EWC code 19 05 01.
Variation determined EPR/AB1234CD	02/07/2019	Varied permit issued.

GENERAL OBSERVATIONS

South West Wood Products, Newport operate under a Tier 3 Bespoke environmental permit for the storage and treatment of waste wood prior to recovery, and the storage of baled Refuse Derived Fuel (RDF). The treatment operations are limited to manual sorting, bulking up, shredding, chipping, and screening of wood and metal waste. No treatment of the baled RDF is permitted other than bulking up for onward transport and all treatment is for recovery only. The maximum quantity of waste accepted and processed on this site shall not exceed 150,000 tonnes per year. The site was operational at the time of the site inspection.

SITE INFRASTRUCTURE

The general housekeeping on the site was in good condition with no major amounts of loose debris located on the floor (as seen in photo 1). South West Wood Products have an on site dust suppression system to reduce the amount of dust / fines in the atmosphere by using a tractor with an attached water bowser (as seen in photo 2). This would routine would be undertaken take regularly to reduce the excess wood dust / fines in the atmosphere. The flooring was also in good condition with no apparent damage / defects as well as the interceptor drainage system which was again, operational with no apparent issues.



Photo 1 - General housekeeping standards were in good order on site visit



Photo 2 - Dust suppression system (tractor with water bowser) undertaking regular routine activities

WASTE ACTIVITIES - WOOD WASTE

During the site visit it was noted that there were a few large stockpiles of woodchipped waste (as seen in photo 3). The majority of this woodchip that is stored on site is processed to make it into smaller / finer items and is then ready for transportation to other sites for further processing and / or recovery such as the Margam Green Energy Plant. The wood waste is tested on site in a laboratory for sizing and moisture content to ensure the correct grading category can be applied before despatching to the end user.



Photo 3 - Dust suppression system (tractor with water bowser) undertaking regular routine activities

FIRE PREVENTION MITIGATION PLAN (FPMP)

During the site visit it was noted by NRW officers that the separation distances of the stockpiled wood waste was compliant however the height of one stockpile in particular exceeded 4 metres (as seen in photo 4). When this was raised with Mr. BOLAND, he indicated that he believed that the acceptable maximum limit of stockpiled wood waste to be 7 metres high. Officer Alex BOWDER reiterated to Mr. BOLAND that 4 metres is the recommended maximum height as dictated by the FPMP guidance which was created by NRW and the Fire and Rescue Service. To clarify, NRW have not granted permission for the site to exceed the FPMP storage height of 4 metres for wood waste stockpiles.



Photo 4 - Stockpile of wood waste with a height above 4 metres

The South West Wood Products, Newport FPMP states the following...

Storage Pile Sizes

- 2.26 Wood waste will be stored in piles sizes taking account of NRW FPMP guidance and the operational need and practicality of running the wood processing. The maximum pile sizes are detailed in table 1 below.

Table 1: Pile Sizes

Waste Type	Max Pile Volume	Dimensions	Tonnage
Unprocessed	2,880m ³	19m x 50m, 4m high	720
Processed	1,672m ³	22m x 19m, 4m high	418
Metal Wastes	100m ³	5m x 5m, 4m high	800

Separation Distances

- 2.27 There will be a minimum separation distance between wood storage piles of 11m to the long sides of the stacks and 7m to the short ends in accordance with NRW guidance, Fire Prevention & Mitigation Plan Guidance – Waste Management Guidance Note 16, graph 1.

The FPMP guidance, as well as the South West Wood Products FPMP, sets the maximum storage height of stockpiled waste to four metres. This height specification was determined by the Fire and Rescue Service (FRS) for general good management practise and stability, to enable the FRS to tackle a fire on site if an incident were to occur. The pile was estimated to be between 5 to 7 metres high at its peak at the time of inspection.

This concern has also been raised on the last site inspection with South West Wood Products, Newport on 09/07/20 (Report ID - CAR_NRW0036780). Please can the site ensure all staff are aware of the 4 metre height restriction that they must be working to. The officers also spoke about suggested practices to make sure the 4 metre height restriction was maintained such as placing a marker on a nearby lamp post to indicate 4 metres in height as a point of reference when storing wood waste.

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

WASTE RETURN SUBMISSIONS

South West Wood Products submitted all of their quarterly waste returns for 2020 on time and in full. They declared a total of 122,798.92 tonnes of waste received and 131,941.66 tonnes of waste removed which is within their permitted allowance.

Officers Alex BOWDER and Greg GARDNER left site at 10.50am the same day.

If you have any issues with this report please contact Greg Gardner

on greg.gardner@naturalresourceswales.gov.uk

I look forward to working with the site in 2021.

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.