

Compliance Assessment Report CAR_NRW0038610

Permit being assessed: NP3699VX.

For: Former J R Steelworks, held by South West Wood Products Limited

At: Bryntywod, Llangyfellach, Swansea, West Galmorgan, SA5 7LE.

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

On 09/08/2021 between 14:00 and 15:00.

Parts of permit assessed: FPMP

NRW Lead Officer: Sally Wakeford, accompanied by Michael Edwards.

Report sent to: Tom Dunn, Regional Manager on 12/08/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	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
0	0

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?

No action required.

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

A site inspection was undertaken on Monday 09 August 2021. The purpose of the inspection was to assess waste stack management in accordance with the Fire Prevention and Mitigation Plan for the site.

Present during the inspection were Sally Wakeford (NRW), Michael Edwards (NRW), Tom Dunn (SWWP), Martin Chubb (SWWP) and the site manager.

Waste storage & Fire Prevention and Mitigation Plan

At the time of the inspection it was estimated by Tom Dunn, using weighbridge data, that there are approximately 5,500 tonnes of unprocessed wood on the site. The typical storage on site is anticipated within the FPMP to be around 9,000 tonnes, maximum of 18,000 tonnes. SWWP are well within the limits of the amount of waste stored on the site at any one time.

Officers measured stacks and the following observations were made:

- One fire break was measured at 5.5m
- One fire break was estimated to be at around 6m.
- Two stack widths were measured as 20m and 18.90m.
- The height was measured on one stack, which was representative of all the stacks on the site, using a 5m pole, it is considered that the stack was below 7m. Photograph inserted below.
- Fire breaks were noted within the lengths of all the stacks, all appeared to be over 4m wide.

The sizes of the stacks on site complies with your Fire Prevention and Mitigation Plan and associated plan LMM/041/01.

It was estimated that since the April approximately 12,500 tonnes of waste has been removed from the site, with a small proportion of it being incoming wastes.

There was a relatively small amount of processed wood on site.

The site appears to be well managed, with a massive reduction in waste on site, manageable amounts of processed waste and the stack sizes and layout aiding the processing of the waste, as well as being in compliance with the FPMP.

Site Drainage

The site has had issues with site drainage during previous inspections. In previous inspections officers have suggested installing hardcore/stone to firm up the tracks around the site. During this inspection there were no issues with ponding of water, however the weather has been relatively dry.

The site has used hardcore to firm up the track around the perimeter of the site, to allow access for firefighting equipment.

The level of the site has dropped to be almost flat, as waste which was on the floor of the site during my previous inspections has been removed. In a number of places around the

site hardcore surfacing was visible. A small amount of “soil” remains in some places, this however, is minimal.

Tom Dunn confirmed that they are looking at discussing with the landlord the installation of a concrete surface over the entire site. Please refer to the Environmental Permit with regards to the site surfacing and drainage requirements, and that any impermeable surface will require sealed drainage (Table S1.1).

Table S1.1 activities

Activity reference	Description of activities for waste operations	Limits of activities
A1 – Wood processing facility	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R3: Recycling/ reclamation of organic	All waste must be stored and treated on hardstanding or an impermeable surface with sealed drainage. All areas of the site will be surfaced with clean hard core which shall be kept clear of waste at all times except for the permitted waste stockpiles which shall be stored in clearly defined areas. There shall be no surface water ponding on any surface within the permitted site.

Photographs of site inspection:









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.