

Compliance Assessment Report CAR_NRW0038943

Permit being assessed: FP3295FN.

For: A1 Skips, held by A1 Waste Management Ltd

At: Newport Docks, Newport, Gwent, NP20 2UW.

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

On 09/11/2021 between 11:55 and 12:30.

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

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

Report sent to: Chris Jones, Technically Competent Manager on 18/11/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B5 - Infrastructure - Plant and equipment	C3 Minor	4.2.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	6.2.2
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)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	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)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F5 - Amenity - Deposits on road	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
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)	

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

Total number of non-compliances recorded	Total non-compliance score
2	4.1

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
B5	Clean up all oil located underneath broken down machinery as soon as possible and ensure any future loss of containment is cleaned and measures are in place to prevent future spills as soon as possible	Already completed
G4	Submit Quarter 2 and Quarter 3 2021 waste return data to NRW and ensure all future waste return submissions are submitted by the designated deadlines as outlined by NRW	30/11/2021

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 9th November 2021 to A1 Skips, Newport, permit reference number EPR-FP3295FN.

Officers Alex BOWDER and Greg GARDNER attended the A1 Skips site at Alexandra Docks, West Way Road, Newport, NP20 2UW for a routine site inspection at 11:55am where we met with the Site Manager, Mr. Chris JONES. 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 or 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

ACTIONS FROM LAST SITE INSPECTION - CAR NRW0037697

ACTION: Create clear waste separation piles to prevent fire risk which does not exceed a height of above 4 metres

COMPLETE: All waste stockpiles on site were separated and no more than 4 metres high

BREACHES FROM SITE INSPECTION - 09/11/21

CATEGORY 3 BREACH – PERMIT CONDITION 4.2.2

(B5) – PLANT AND EQUIPMENT

“In the event of any potentially polluting leak or spillage occurring on site the documented control and remediation procedures shall be implemented immediately and recorded in accordance with the standards specified”

- Large pooling of oil underneath broken down plant with potential of contamination

Please see report content for further justification

CATEGORY 4 BREACH – PERMIT CONDITION 6.2.2

(G4) – REPORTING AND NOTIFICATION TO NATURAL RESOURCES WALES

“A summary of the information, including nil returns, shall be submitted to the Agency. Summaries shall be for each quarter of the financial year and shall be submitted to the Agency within one month of the end of each quarter.”

- The operator has failed to submit its Waste Return documents for Quarter 2 and Quarter 3, 2021. It is essential to submit your Returns

data to NRW on-time to allow us to assess your waste inputs and outputs, even if for a null-return. Operators have a one-month grace period to submit quarterly/annual returns.

Please see report content for further justification

GENERAL OBSERVATIONS

A1 Skips, Newport operate a waste transfer station facility.. The maximum quantity of waste accepted and processed on this site shall not exceed 24,000 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). There was constant movement of waste at the time of the inspection ensuring the housekeeping in the area remained of a good standard.



Photo 1 - General condition of on site housekeeping

The site had an interceptor drainage system which was operational at the time of the site inspection. There were no concerns of it's operation and Mr. JONES informed NRW Officer that this interceptor drainage system is cleaned out regularly to prevent it from not operating correctly and efficiently.

Whilst on site NRW Officers noticed a large pool of oil located underneath a broken down piece of plant (see photo 2). Mr. JONES informed NRW Officers that this had broken down approximately 2 days prior to our site inspection and work on repairing the broken down plant took place on the day of inspection where the oil pooling occurred. NRW Officers informed Mr. JONES that the oil needed to be cleaned up as soon as possible to prevent any further pollution occurring. To remind the operator that within section 4.2.2 of their environmental permit (control and remediation of leaks and spillages) that:

"In the event of any potentially polluting leak or spillage occurring on site the documented

control and remediation procedures shall be implemented immediately and recorded in accordance with the standards specified"

Although the large pool of oil was contained within a zone underneath the broken down plant and there was no evidence of a pathway to a receptor the potential risk may have increased if there was heavier rainfall and / or further oil was deposited from the broken down plant. The operator has put in place oil remediation measures (oil spill kits) immediately following our site visit and has since briefed the engineer undertaking the repair work on safe working practices and tidying the workspaces after activities (see photo 3).



Photo 2 - Pool of excess oil originating from broken down plant



Photo 3 - Oil remediation measures in place following our site visit (Photo taken and provided by Site Manager Mr. Chris JONES following our site visit on 09/11/21)

ACTION: Clean up all oil located underneath broken down machinery as soon as possible and ensure any future loss of containment is cleaned and measures are in place to prevent future spills as soon as possible.

COMPLETE: Operator immediately remediated the area following our site visit where the oil pooling has occurred and reminded staff on safe working practices and tidying the workspaces after activities.

WASTE ACTIVITIES - GENERAL

The site operates as a waste transfer station where various different types of waste are accepted, sorted and removed from site. On site a large, open ended warehouse was used to house the accepted waste prior to being separated and transported to other sites for further processing / storage. Scrap metals, non-ferrous and cardboard items are transported to EWS with wood waste is transported to South West Wood Products, Newport. Soil waste is transported to Neal Soils with any green waste transported to the nearby Newport landfill site. No ELV (End-of-Life Vehicle) waste was accepted on site. (See photo 3 below).



Photo 3 - General waste stored in open-ended warehouse

WASTE RETURN SUBMISSIONS

According to NRW records, A1 Skips have only submitted Quarter 1 waste return data for 2021. For 2021, a total of 1,966.25 tonnes of waste was accepted and a total of 4,001 tonnes was removed. This is within their permitted allowance and no unidentified / unauthorised waste streams were accepted. As a reminder to the operator, please see below the waste return submission deadlines:

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: Submit Quarter 2 and Quarter 3, 2021 waste returns to NRW following the issue of this CAR form even if a null return is declared.

Officers Alex BOWDER and Greg GARDNER left site at 12.30pm 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.