



## Environmental Review Update 2014

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### Disclaimer

*The information given in this report is based upon the results of visits, interviews, discussions and information provided by NPTC Group. The Wales Green Business Centre will not be held responsible for the misuse or misapplication of the information provided in this report. NPTC Group are advised to fully consider all implications that may result from implementing any advice or recommendations detailed within this report.*

### **Introduction**

Since the Initial Environmental Review, NPTC Group have undergone a number of significant changes to the structure of the College, its operations and to the course and services provided. This document assess the alterations and considers how they have impacted NPTC Group's environmental performance; highlighting areas for environmental improvement and forms of good environmental practice.

Due to NPTC Group's recent merger with Powys College, NPTC Group have acquired seven new sites. The new sites include:

- Brecon Campus
- Fronlas Farm
- Llandrindod Campus
- Llanelwedd
- Newtown Campus
- Pen Dinas
- Ystradgynlais

With exception of Fronlas Farm the majority of the new sites replicate activities and courses already available at the College.

It is to be noted that NPTC Group no longer has the campus based at Margam County Park.

A full description of each site owned by the college can be found in NPTC Group's **Profile, Description, Size & Location of the Estate** document.

### NPTC Group

NPTC Group is the only Further Education provider in the Neath Port Talbot County Borough Council & Powys areas. The College offers over 370 courses to suit many needs, either on a part-time or full-time basis, and employs over 800 members of staff. NPTC's premises comprises of 17 sites, which have a gross total area of 87,298m<sup>2</sup>, and are located across 4 counties; Powys, Neath Port Talbot, Swansea and Bridgend

The choice of courses on offer at the College currently include: Adult Learning; Building & Engineering; Business Management & Leisure Studies; Catering, Hospitality & Agriculture; Computing & IT; Construction & Built Environment; Creative, Visual & Performing Arts; Engineering; Health, Social & Child Care; Horticulture, Hairdressing & Beauty; Mathematics & Science; Sport & Public Service; Social Studies & Languages; and Pre-Vocational Studies

### ***Environmental Management & other Management Systems***

Since the Initial Environmental Review, NPTC Group have achieved Green Dragon Level 4 and within the next 6 months are hoping to roll out their Green Dragon Level 4 accreditation to the college's newly acquired campuses.

Colin Heffey, the Facilities and Estates Manager at NPTC Group, has undergone formal Environmental Management Training and other members of staff at the college have also received some form of environmental training through courses or their university education.

### ***Environmental Awareness***

NPTC Group have a Strategic Sustainable Management Task Group which meets twice a term discuss environmental aspects and the environmental performance of the college, and to investigate methods and measures for improvement.

Environmental issues are regularly communicated to members of staff through email and posted prompts are used throughout the college in order to boost the students' environmental awareness and to promote good environmental practice. NPTC Group also provides Environmental Awareness Training to students as part of their college induction and provide further environmental and sustainability training through ESDGC.

Both Staff and student have access the college's EMS, in addition to extra environmental and sustainability information through the college's intranet

### ***Agriculture***

As part of the merger with Powys College, NPTC Group have acquired a farm and are now able to cater for students wishing to pursue a career in agriculture. The farm, which is part of the college's Catering, Hospitality and Agriculture Department, caters for 150 students and ha total of 8 members of staff, including a dedicated farm manager who resides on site.

Fronlas Farm is a 300 acre commercial cattle and sheep farm located in Newtown, Powys and currently consists of a 150 cattle, 750 breeding sheep, and 1100 lambs. The Farm operates 7 days a week, 365 days a year and includes a teaching block, the Farm Manager's house, agricultural farm buildings, a hill farm and pasture.

Fronlas Farm's main site in Mochdre Lane is where the students are primarily based and where the majority of the educational activities are undertaken. The site includes a farm vehicle workshop, teaching rooms, a cattle shed, yard and slurry tank.

Within the farm's vehicle workshop, where all farm vehicles and plant is maintained, a number of hazardous substances are stored and used. COSHH MSDS have been obtained for all regulated substances and all substances are store according to the MSDS. Within the workshop there are also separate waste containers for the disposal of contaminated materials and oil filters, a spill kit and a parts washer. All waste oil filters, contaminated materials and waste from the parts washer are classed as hazardous waste and are collected for disposal by Safety Kleen

Within the main yard area diesel is stored in above ground tanks, which are stored above a bunded area. Noted that all liquid contained within Fronlas Farm's bunded area and the majority of surface runoff from the Farm's main yard flows through an interceptor to an underground waste water tank. The tank and interceptor are cleared on a bi-annual basis and the appropriate waste documentation is obtained and retained.

Within the cattle shed both cattle and farm dogs are kept when not out on the farm. An asbestos register for the cattle shed has been obtained as the shed contains asbestos materials. All surface runoff from the cattle shed and surrounding areas flow to a holding system prior to being pumped into the Farm's slurry tank, which is double bunded and double valved. Testimony states that Fronlas Farm's slurry tank levels are checked on a daily basis, however at present there are no formal inspections being undertaken.

As part of the NPTC Group's commitment to pollution prevention the farm have developed and implemented a site specific pollution plan, spill procedure and waste management procedure. Fronlas Farm have also implemented a Bio-Security Plan and have developed a Resource Management Plan which covers environmental issues, compliance with environmental legislation and pollution prevention.

All waste produced at the farm is segregated prior to collection and is either stored within waste containers at the front of the site or within the yard. Noted that the majority of waste stored within the yard is currently uncontained, with the exception of scrap metal, which is stored in a skip prior to collection.

The farm currently recycles paper, cardboard, plastic, wood, metal, food waste and green waste, the majority of which is collected by Powys County Council or Veolia. All veterinary, medical and sharps waste is taken for disposal by the vets who bring them to site and all fallen stock is disposed of in line with the Animal By-Product (ABP) Regulations with Rural Incineration & Disposal Ltd.

Fronlas Farm have registered a number of waste exemptions (EPR/G558EW Expiry: 13.11.2016). The exemptions cover the following activities:

- D1 - Deposit of Waste from Dredging of Inland Waters (Agricultural Waste only)
- D7 - Burning Waste in the open (Agricultural Waste only)
- T23 - Aerobic composting and associated prior treatment (Agricultural Waste only)

- T6 - Treatment of waste wood and waste plant matter by chipping, shredding, cutting or pulverising (Agricultural Waste only)
- U1 - Use of Waste in Construction (Both agricultural and non-agricultural waste)
- U10 - Spreading waste on Agricultural Land to confer Benefit (Agricultural Waste only)
- U8 - Direct and Beneficial use of Waste for a specified Purpose (Both agricultural and non-agricultural waste)

Fronlas Farm have also registered to discharge sheep dip to land (5/01/95623/LG111 Expiry: 09.04.2014). Sheep dipping is undertaken in compliance with the regulations.

The use of fertilisers, manure and slurry is closely monitored by the farm. Martin Watkins keeps a record of all fertiliser, manure and slurry spread through the use of maps. Martin uses the maps of the farm's fields to record running totals of spreading volumes to ensure the Farm does not exceed the threshold limits for spreading. Martin Watkins has also developed a map of the Farm that highlights the location of watercourses and high risk spreading areas. No spreading is undertaken in any areas or fields that are deemed to be high risk.

When spreading manure and slurry Fronlas Farm ensure:

- An up-to-date nutrient management plan is in place
- No spreading is undertaken within 10 metres of a watercourse, within 50 metres of a source of drinking water for human consumption or on steeply sloping fields where there is a risk of run-off

Pesticides are occasionally used at Fronlas Farm, nevertheless when they are used they are closely monitored. Martin Watkins keeps a record of all pesticide use and staff based at the Farm, including Martin Watkins, have received City & Guilds pesticide training.

During the most recent visit to Fronlas Farm a number of environmental non-conformances were identified. The non-conformances, which mainly relate to pollution prevention and legal compliance, are listed below, in addition to recommended corrective action.

Non-Conformance	Corrective Action
Fronlas Farm's waste metal collected for disposal every 2 years.	In future the college are to ensure that all waste produced by the Farm is collected for disposal at least annually. This is to be demonstrate this through the retention of waste documentation.
Fronlas Farm have received hazardous waste returns for the disposal of waste with Safety Kleen, however the corresponding waste consignment notes could not be located. Waste consignment notes for the collection of hazardous waste by Metro Rod and waste transfer notes for the collection of waste by Veolia were also not available during the visit.	In future all waste documentation is to be stored centrally with NPTC Group's Estates Department. However, in the meantime Fronlas Farm are to ensure that the correct waste documentation is obtained and retained.
Waste plastic drums are stored externally. Noted that a number of the drums had filled with rainwater, which had mixed with an unidentified and potentially hazardous liquid contained within the drums. Waste car batteries were also being stored externally, uncontained and uncovered.	Fronlas Farm are to ensure that all waste is stored appropriately and that all potentially hazardous waste is disposed of according to regulations and without risk of pollution. NPTC Group are also to provide Fronlas Farm with a suitable container for the storage of waste batteries.

Fronlas Farm carry waste, however neither the Farm nor NPTC Group are registered as waste carriers.	NPTC are to register as a waste carrier with NRW. Noted that if only transporting non-construction waste NPTC Group can register as a lower tier waste carrier, free of charge.
Waste wood produced at Fronlas Farm is burnt. As the waste wood pile at Fronlas Farm contained a mix of both non-contaminated and contaminated wood it is possible that contaminated waste is being burnt on site.	All non-contaminated waste wood is to be segregated and stored separately from contaminated wood, ensuring that the risk of contaminated wood being accidentally burnt is minimal.

Prior to the visit to Fronlas Farm, Martin Watkins prepared a statement on the promotion of environmental management and sustainable systems across the farm and on the delivery of land based curriculum. The Statement has been included within the text box below.

### Fronlas Farm Environmental Schemes

*The farm has been involved in several Welsh Government schemes to promote environmental improvement for a number of years.*

*Tir Cynnal – An entry level environmental scheme, which the farm entered in 2006. The scheme involves restrictions on spreading FYM and fertilizers within 1 metre of field boundaries and also leaving 25% of the farm hedges uncut in any one year.*

*Glastir – A second level environmental scheme, which the farm entered in 2010. Glastir requires all slurry produced on the farm being applied to the ground either by injection or with a trailing shoe device, minimising pollution and improving soil uptake. The scheme also requires the farm to grow a minimum of 4ha of both unsprayed spring cereals and root crops to encourage environmental diversity.*

### Environmental Practices

*The farm has both a resource management and a slurry / manure management plan in place to ensure that all waste products are disposed of in a sustainable manner and to the maximum benefit of the farm and the environment.*

*Established disposal routes are in place for all waste products from both the farm and the teaching workshops, and an emergency plan is in place for any major spillages.*

*Permits are in place with Environment Agency for disposal of waste wood material, waste building materials and disposal of dilute sheep dip on the land.*

### Land based Curriculum delivery

*All learners receive teaching input on environmental aspects and ESDGC as part of the curriculum delivery.*

*Many of the learners are apprentices and ESDGC forms part of the bi-monthly review, which involves the learner, the college and the employer.*

*Level 3 curriculum delivery includes aspects of environmental management and planning and an awareness of Welsh Government environmental schemes.*

*The farm has been involved in a number of "Pasture to Plate" type initiatives, which promote local food production and consumption and the reduction of food miles. Beef and Lamb from Fronlas farm is used in the college "Themes" restaurant, which again promotes the use of local produce.*

### ***Pollution Prevention***

NPTC Group are committed to pollution prevention and have implemented a range of measures to ensure the risk of pollution arising from the college's activities is kept to a minimum. The college have also developed a Pollution Prevention Plan and an Emergency Preparedness Procedure to ensure that all pollution incidents are effectively controlled.

Hazardous substances are stored in compliance with COSHH regulations and spill kits have been made available in areas of the college that are deemed to have a high pollution risk. NPTC Group have also developed a spill procedure and have provided waste containers for the disposal of any contaminated materials.

Within the college's Motor Vehicle and Engineering Departments oil and other hazardous substances are stored on drip trays and interceptors have been installed, and at the Pontardawe campus a designated vehicle wash-down area has been fitted to ensure the waste water does not enter the River Tawe which runs adjacent to the campus.

All college buildings thought to contain asbestos have been subject to an asbestos survey and Asbestos Registers have been implemented. Noted that the Newtown Campus has recently had a significant amount of asbestos removed from its buildings. Waste documentation for the removal of this asbestos has been obtained.

Pollution prevention t at Fronlas Farm has been addressed under Agriculture.

### ***Use of Resources & Raw Materials***

NPTC Group's consumption of resources and raw materials has significantly risen since the merger with Powys College, purely due to the increase in sites, courses, staff and students.

NPTC Group has a Sustainable Procurement Procedure and are currently in the process of developing a Sustainable Procurement Strategy. NPTC Group also follow the 'Green Buyers Guide' handed to them by the Local Authority.

All toilet paper and tissues paper used at NPTC Group is from recycled resources. NPTC Group is also currently investigating purchasing 100% recycled copier paper. The Construction Department already only purchase FSC wood and have a number of procedures in place in order to minimise waste and to increase the efficiency of their material usage.

Brick waste produced at Newtown is reused at the Farm.

### ***Energy Consumption & Efficacy***

Due to the recent merger with Powys College, NPTC Group's energy consumption is expected to almost double over the year, simply due to the increased number of sites. In order to manage energy consumption the college has implemented a Sustainability Policy which aims to increase the energy efficiency of the college and reduce consumption.

All NPTC Group campuses are monitored in regards to energy consumption. The Neath and Afan campuses' energy consumption is monitored every half hour using an Enica LED and pulse meter

loggers, whereas at the college's other campuses energy consumption is monitored using metre readings taken by the college's caretakers and security.

Measures implemented to keep energy consumption to a minimum include:

- The use of individual thermostatic valves on all radiators, allowing them to be adjusted manually to ensure they are not constantly on full throughout colder periods.
- The implementation of a programme which allows members of the college's facilities team to operate all boilers, heating and ventilation systems remotely from a computer.
- Posted prompts to encourage staff and students to switch lights and equipment off when not in use.
- LED lighting

### **Waste**

NPTC Group currently have a calculated recycling rate of 91.69%, however it is to be noted that this figure does not take into consideration the waste produced at the college's newer sites.

NPTC Group currently recycle:

Paper	Wood
Cardboard	Scrap Metal
Plastic	Mixed Construction Waste
Tins/Cans	Batteries
Food Waste	WEEE

Noted that NPTC Group have changed their main waste contractor to Veolia, as by March 2014 all waste collected for disposal by Veolia will be diverted from landfill through EfW.

NPTC Group have developed a Waste Management Table in order to ensure waste is managed in compliance with environmental legislation.

Waste produced by NPTC Group is collected by a number of different waste contractors. The majority of waste transfer and consignment notes for the waste are held centrally within NPTC Group's Neath Estates Department.

NPTC have registered 7 Campuses with the NRW as Producers of Hazardous Waste. The Campuses and their Registration Numbers are as below:

Neath Campus	AAH811	21.07.2015
Buildings Craft Centre	AAH813	21.07.2015
Afan Campus	NEK980	21.07.2015
Construction Training	NEK980	21.07.2015
Tawe House	NWV533	15.12.2014
Fronlas Farm	AAJ721	06.12.2015
Newtown Campus	ALA818	06.12.2015

Hazardous waste produced by NPTC Group includes:

WEEE	Engine Oil	Parts Cleaners
Fluorescent Tube Lights	Spill Kit Material	Lab Waste
Refrigerators	Interceptors	Cutting Fluids

Contaminated rags

Paints

Coolants

The majority of hazardous waste produced by NPTC Group is handled appropriately and in line with legislation, however during the most recent assessment of the college the following was noted:

- Within the Motor Vehicle and Engineering Departments contaminated rags and oil filters were being disposed of as general non-hazardous waste.
- WEEE produced at Brecon is either disposed of by the IT Department or is taken by the college to a local recycling facility, thus the college are not obtaining any waste documentation for the disposal of the WEEE.
- Redundant fluorescent tube lighting produced within the Powys campuses is collected by estates and is taken to Newtown for disposal, however NPTC Group are not registered as waste carriers.

To address these non-conformances all waste oil filters and contaminated materials are to be segregated and disposed of separately to all other waste, all WEEE is to be disposed of with a registered waste carrier and if continuing to carry waste the college are to register with NRW as a waste carrier. Noted that if only transporting non-construction waste NPTC can register as a lower tier waste carrier free of charge.

### ***Emissions to Atmosphere***

Emissions to atmosphere from NPTC Group mainly consist of CO<sub>2</sub>, which arises from the use of transport. Other emissions include fumes and vapours from chemicals, fuels and oils, dust from construction activities, onsite boilers and welding.

Further emissions arise from emergency situations, including fire and the accidental release of ODS or F-Gas from air conditioning and refrigeration units. To ensure the risk of ODS or F-Gas entering the atmosphere is kept to a minimum all units are subject to annual maintenance and leak tests. NPTC Group have also developed an Assets List, allowing the units and the gases within them to be effectively monitored.

Noted that during the latest visit to the college it was identified that refrigeration and air conditioning units at the Brecon and Newtown campuses had not been subject to any form of annual maintenance or leak checks under Powys College. In order to address this NPTC Group are to identify all units within an Assets List and are to ensure that they are all subject to maintenance and leak check as soon as practically possible.

Emissions to atmosphere from Fronlas Farm are addressed under Agriculture. Noted that Fronlas Farm hold an exemption for the burning of waste.

### ***Transport & Logistics***

NPTC Group have implemented a Travel Plan in order to move towards more sustainable modes of transport and to reduce the traffic and congestion caused by staff and students at the college. NPTC Group have also made bike shelters, showers and changing rooms available to those who chose to cycle.

All business millage undertaken in private vehicles is recorded via the college's finance department. Noted that there has been a significant rise in business millage due to the merger with Powys College, as staff are now regularly required to travel between Neath and Powys.

***Nuisance***

Environmental nuisances posed by NPTC Group remain fundamentally unchanged. Nuisances caused by the college include; noise produced by traffic entering and leaving college premises, events held by the college and construction activities, which also can cause dust, and litter.

Noted that nuisance Fronlas Farm may also be a potential source of environmental nuisance.

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