

Compliance Assessment Report

Report ID:
CAR_NRW0023756

This form will report compliance with your permit as determined by an NRW officer

Site	BRIDGEND WASTE MANAGEMENT CENTRE	Permit Ref	NP3233XX			
Operator/Permit holder	Tradebe Gwent Limited					
Regime	Installations					
Date of assessment	01/07/2016	Time in	09:30	Out	12:30	
Assessment type	Audit					
Parts of the permit assessed	1.1.1, 2.3.4, 2.5.1, 3.2.1, 3.6.3					
Lead officer's name	Thomas, Ffion					
Accompanied by						
Recipient's name/position	Andrew Price/ Site Manager	Date issued	12/01/2017			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This Compliance Assessment Report (CAR) form has been completed following the pre-planned site visit undertaken on 30th June 2016 as part of the ongoing regulatory compliance of the Tradebe Bridgend Waste Management Centre, EPR NP3233XX

Audit Agenda

- Provision of information – general discussion and update on any new relevant legislation. Discussions advice or guidance.
- Condition 1.1.1(b) – Evidence required of valid (in date) TCM and WAMITAB certification
- Condition 2.5.1 – IP2 – I was unable to find evidence within our archive that this Improvement Programme item has been addressed. The Waste acceptance audit undertaken during the last visit did not look specifically at this condition. A review of documentation addressing IP2 “the operator shall produce and implement written procedures (and any amendments to them) that accord with section 2.1.2 of sector guidance note S5.06. December 2004, to cover sampling of bulk wastes, drummed wastes and laboratory smalls; and records” Will be undertaken. – Please ensure you have any relevant documentation available, or forward prior to our site meeting.

Note sector guidance note S5.06 has been amended and re-published since the permit condition was written and now issue number 5 dated May 2013.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/298118/LIT_8199_dd704c.pdf

- Condition 3.6.3 – Evidence required of MCERTS Certification or accreditation for monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified under condition 3.6.1 Table S4.3
- Site inspection

Present

Ffion Thomas (FT) – NRW PPC officer

Julie Campbell (JC) – SHEQ manger Tradebe

Andrew Price (AP) – Site Manager, tradebe

Mark Griffiths (MG) – Gwent Regional Business Manager – Tradebe

Previous CAR update:

No outstanding actions were carried forward

- Prevision of information:

Brexit: A general discussion was had regarding the impacts of the recent referendum resulting in the Brexit vote. Ffion Thomas confirmed that until such time as the UK completed instigation of article 50, and then negotiated and implemented new UK law the Environmental Permitting regulations would still apply, and to all tense and purpose it was business as usual.

Mark Griffiths confirmed that he had spoken with his managers and that as the company is Spanished owned CE did not envisage

there to be any cause for concern following the vote leave result.

BREF: An update was given regarding the progress of the Waste Treatment BREF. Ffion Thomas confirmed that as far as NRW were aware the draft document, following consultation responses, was still being reviewed by European IPPC Bureau. (see below snap shot below for background of the EIPPCB) No timeframe had been forwarded as to when this review of consultation responses would be completed nor when the next draft version would be published.

Ffion encouraged Tradebe to remain vigilant and keep an eye on the EIPPCB web site for details.

Julie Campbell confirmed that Tradebe had fed into the consultation and that they had one of their directors, Andrew Crowther inputting directly into one of the EIPPCB discussion groups and so directly influencing the BREF.

<http://eippcb.jrc.ec.europa.eu/reference/wt.html>

The European IPPC Bureau exists to catalyse an exchange of information between Member States and the industries concerned on Best Available Techniques (BAT), as required by Article 13(1) of the **Industrial Emissions Directive (IED, 2010/75/EU)**. The IED is a major environmental legislation which regulates around 50000 installations in the EU dealing with a wide range of industrial and agricultural activities.

The Commission's guidance on the practical arrangements for the exchange of information under the **Industrial Emissions Directive (IED, 2010/75/EU)**, including the collection of data, the drawing up of BAT reference documents (BREFs) and their quality assurance' as required by Article 13 (3)(c) and (d) of the Directive can be found in the **Official Journal** of the European Union.

FT enquired as to which aspects of the Draft BREF Tradebe envisaged causing a problem, so that NRW could ensure they were aware of any operational issues that had not been captured during our review. JC agreed to forward details of what Tradebe had consulted on.

ACTION JC – forward details of envisaged BREF issues. – Completed. Email received 1/7/16 with Tradebe consultation BREF details.

- Condition 1.1.1(b) – Evidence required of valid (in date) TCM and WAMITAB certification.

AP emailed his current and in date TCM WAMITAB certificate. This was received ahead of the audit site visit on the 16th May 2016. A copy of the certificate is included below and shows continued competency of the treatment of hazardous waste until the 9th February 2018.

FT confirmed the item had been actioned and condition compliance met.



Certificate No. CCC10855

Continuing Competence Certificate

This certificate confirms that

Andrew Michael Price

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 09/02/2016

TMH Treatment - Hazardous Waste

Awarded: 09/02/2016

Expiry Date:
09/02/2018

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



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- Condition 2.5.1 – IP2 – I was unable to find evidence within our archive that this Improvement Programme item has been addressed. The Waste acceptance audit undertaken during the last visit did not look specifically at this condition. A review of documentation addressing IP2 “the operator shall produce and implement written procedures (and any amendments to them) that accord with section 2.1.2 of sector guidance note S5.06. December 2004, to cover sampling of bulk wastes, drummed wastes and laboratory smalls; and records” Will be undertaken. – Please ensure you have any relevant documentation available, or forward prior to our site meeting.

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Again Tradebe provided the required information ahead of the audit. The document “Bridgend Waste reception and Handling” “The reception, inspection, routine & storage of bulk waste & process chemicals” “PBRH 100 issue 2” dated 23 October 2015 was forwarded to NRW by email on the 29th June 2016.

A review of the document was undertaken by Ffion Thomas and points for clarification were discussed during the site visit.

These points confirmed that “SAP” is Tradebes internal database system tracking customer accounts including waste acceptance procedures.

AP confirmed that the procedure for "the sampling of waste materials Procedures PGRH 103" is available on site.

Section 2.10 of the procedure was discussed. As there is an onsite laboratory the samples are taken and analysed before any wastes enter the tank. A sample of the tank content is taken and the "new" waste added so as to assess if the waste is compatible.

Section 3.12 of the procedure was also discussed. FT saw documentation showing the oil tank levels are recorded. This is done by obtaining information from the site telemetry system and recorded on a spreadsheet. AP provided a copy via email on the 1st July 2016 of the oil tank levels.

The waste reception and handling document makes reference to the COMAH regulations requiring oil tank levels to be monitored. Tradebe undertake this monitoring through telemetry systems measuring the tank levels and record this data daily. A photograph was taken of the telemetry system and the scan below illustrates the records.

OIL/WATER PLANT ONLY FILL TO 4.8 UNTIL LEVEL SENSORS HAVE BEEN CALIBRATED

Non haz waste

	3A	3B	3C	3D	3E	T4 ²⁵⁷	T5	T6A	T6B	I01	I02	I03	I04	SIGN	
Monday	1.7 4.1	1.7 4.1	1.6 4.1	5.1 4.1	3.4 4.1	5.3 4.3	4.0 4.1	0 4.1	4.5 4.1	0 4.1	0 4.1	0 4.1	0 4.1	AM PM	AP
Tuesday	1.7 1.7	1.7 1.7	1.6 1.6	5.1 5.1	3.4 3.4	4.3 4.3	4.0 4.0	0 0	4.5 4.5	0 0	0 0	50 50	0 0	AM PM	CM
Wednesday	1.7 1.7	1.7 1.7	1.6 1.6	5.1 5.1	3.4 3.4	4.3 4.3	4.0 4.0	0 0	4.5 4.4	0 0	0 0	50 50	0 0	AM PM	AP
Thursday	1.7 1.7	1.7 2.6	1.6 1.6	5.1 5.1	3.4 3.3	4.3 4.3	4.0 4.0	0 0	0 0	0 0	0 0	50 50	0 0	AM PM	AP
Friday	1.7 1.7	2.6 2.6	1.6 1.6	5.1 5.1	3.3 3.3	4.3 4.3	4.0 4.0	0 0	0 0	0 0	0 0	50 50	0 0	AM PM	AP
Saturday														AM PM	

Some levels show more than 4.8 as the readings sometimes rise as well as fall, this will become more stable when sensors are calibrated.

Week Commencing



As all points of discussion were addressed NRW confirms via this CAR form that the Improvement Programme ref IP2 has been complied with. During the next permit review and/or variation application whichever is the sooner the report titled "Bridgend Waste reception and Handling" "The reception, inspection, routine & storage of bulk waste & process chemicals" "PBRH 100 issue 2" dated 23 October 2015 will be included into the table S1.2 operating techniques.

I would like to take this opportunity to confirm that all items in Table S1.3 have now been met and compliance with condition 2.5.1 achieved.

- Condition 3.6.3 – Evidence required of MCERTS Certification or accreditation for monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified under condition 3.6.1 Table S4.3.

Tradebe forwarded documented evidence of their MCERTS certification via email prior to the site audit, the submission was received on the 9th June 2016. The scan below provides the evidence that the accreditation is in place. A copy of the audit findings ref 16EO266 have been saved to our files for reference. The SIRA audit identified 1 minor and 1 observation regarding the verification of flow data, requiring the cross referencing of individual flow meter displays with the control room readings, and the need to schedule internal audits. Tradebe have since applied both points raised and cross referencing of flow data is now undertaken and an internal audit is scheduled for November.

To facilitate the internal audit Ffion Thomas agreed to share the NRW OMA to water guidance document, and would also undertake an audit in November.

The item has been complied with.

- Site inspection

An inspection of the working area was undertaken. During the inspection areas of impermeable pavement and bunding were visually checked and found to be in good condition with no defects identified at the time of the inspection.

A new flow meter has been installed at the domestic effluent discharge. This work required the impermeable pavement to be replaced, and a visual inspection did not highlight any concerns over the standard of works undertaken. A high level of housekeeping is achieved at the site. With product and waste IBC's stored within the bund/containment area draining to sewer.

There is an ongoing programme of updating infrastructure at the site. With the appointment of a new electrician new level

monitoring equipment, electric circuit boards and pumps have been installed. This is an illustration of Tradebe's commitment to renewing and maintaining infrastructure, plant and equipment at their site.

- AOB

DCWW consent

Since the audit was undertaken MG has provided confirmation of the new DCWW discharge consent. This information was received by email submission on the 5th July 2016. Cross referencing the limits within the consent with those in the EPR permit has shown the need for the permit to be reviewed as limits differ.

ACTION Tradebe, please confirm if you wish to vary the EPR permit limits at which point FT will consult with our permitting team especially in light of the NB of Table S4.3

Hazardous waste registration and reporting.

A desk top check was done on Tradebe's Hazardous waste registration. The review showed the site as compliant with regulations and registered as a hazardous waste producer under ref CAB356.

[illegible]

Consignee returns have been submitted and filed, a review has not identified any missing information or errors. Waste returns were also checked and waste codes found compliant with permit showing compliance with condition 2.3.4 and 3.2.1

Any compliance criteria not highlighted in the above summary should be considered as not assessed.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0023756**

This form will report compliance with your permit as determined by an NRW officer

Site	BRIDGEND WASTE MANAGEMENT CENTRE	Permit Ref	NP3233XX
Operator/Permit holder	Tradebe Gwent Limited	Date	01/07/2016

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.