

Compliance Assessment Report

Report ID:
CAR_NRW0031849

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	14/06/2017	Time in	10:00	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	1.1.1, 2..3.1, 2.5.1, 3.1.1				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Andrew Price/ Stie Manager	Date issued	07/07/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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
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 has been completed following the pre-planned site inspection undertaken on 14th June 2017 as part of the on-going regulatory compliance of the Tradebe Installation permit NP3233XX at Bridgend.

During the inspection the waste facility permit, GP3298FY was also inspected. Many areas of the operational management of that facility has cross over with the installation permit. The full details of the inspection will therefore be recorded in this CAR form, but a second form will be produced specifically for the waste facility and sorted under the sites NRW file.

Agenda:

1. follow up on any previous CAR actions
2. Update our records with your MCERTS certificate and any other Tradebe internal audits.
3. Site discharge conditions/consents.
4. Permit pre-app advice.
5. Site safety – review of DSEAR
6. Pre acceptance cross reference with How to comply, SGN 5.06 and Waste treatment BREF BAT.
7. Site inspection – waste storage areas, plant operations, bunds.

Present:

Ffion Thomas – Senior Environment Officer NRW

Julie Campbell – SHEQ manager

Andrew Price- Site manager

Mark Griffiths – Gwent Regional business manager

1. Previous CAR form actions

No actions were carried forward but further discussion was had in relation to permitting application advice and potential consolidation and variation to update consent limits. This is discussed further under separate heading.

1. Update our records with your MCERTS certificate and any other Tradebe internal audits

Mark Griffiths explained how the company had recently had a number of internal and external audits, including their MCERTS and ISO accreditations. Copies of certificates were provided and evident the ongoing accreditations held by the company and site.

MCERTS accreditation is noted as compliance with the permit condition. A copy of the current certificate was provided as hard copy during the inspection and is copied below:

MCERTS Inspection Certificate

This is to certify that the effluent flow monitoring arrangements at:

Consent/Permit holder: **Tradebe Gwent Ltd**
Site: **Bridgend**
Emission point ref: **Domestic, Hazardous, Industrial**

Site reference or postcode: **CF35 5BQ**
Grid reference: **SS 9120 7715**
Consent/Permit ref: **NP3233XX**

have been inspected and found to comply with the Environment Agency's MCERTS standard:

Minimum Requirements for the Self-Monitoring of Flow Version 4.0 August 2014

The results of the inspection of the flow measurement system are given in the following report:
Tradebe Bridgend Domestic Report 31Mar16, Tradebe Bridgend Hazardous Report 31Mar16,
Tradebe Bridgend Industrial Report 31Mar16

The Consent/Permit holder's management system has been audited and found to comply with the above MCERTS requirements.

This certificate is issued subject to the Consent/Permit holder maintaining its management system to the required standard, which will be subjected to periodic surveillance. The use of this certificate and the Sira Certification Mark are subject to the Regulations Applicable to Holders of Sira Certificates.

Certificate No:	Sira ME16	3391	rev 1
Date of initial certification:	29-Apr-09		
Date of site inspection (valid from):	31-Mar-16		
This certificate issued:	20-Jun-16		
Renewal date:	31-Mar-21		



J Prince MSc MInstMC
Deputy Certification Manager

MCERTS is operated on behalf of the Environment Agency by

Sira Certification Service

Unit 6, Hawarden Industrial Park,
Hawarden, Deeside, CH5 3US
Tel: +44 (0)1244 670 900

SCS/SF/242
Issue 12
December 2014

This certificate remains the property of Sira and shall be returned when requested.
It may only be reproduced in its entirety and without change.

The ongoing accreditation with SGS ISO demonstrates the good performance of the site and company.

Copies of the certificates were provided via email during the visit (received 14/6/17) and copied below.

SGS is the world's leading inspection, verification, testing and certification company. We are recognised as the global benchmark for quality and integrity. With more than 90,000 employees, we operate a network of more than 2,000 offices and laboratories around the world.

Our core services can be divided into four categories:

- **Inspection:** our comprehensive range of world-leading inspection and verification services, such as checking the condition and weight of traded goods at transshipment, help you to control quantity and quality, and meet all relevant regulatory requirements across different regions and markets
- **Testing:** our global network of testing facilities, staffed by knowledgeable and experienced personnel, enable you to reduce risks, shorten time to market and test the quality, safety and performance of your products against relevant health, safety and regulatory standards
- **Certification:** we enable you to demonstrate that your products, processes, systems or services are compliant with either national or international standards and regulations or customer defined standards, through certification
- **Verification:** we ensure that products and services comply with global standards and local regulations. Combining global coverage with local knowledge, unrivalled experience and expertise in virtually every industry, SGS covers the entire supply chain from raw materials to final consumption.

ISO 9001 - CERTIFICATION - QUALITY MANAGEMENT SYSTEMS

Implementing ISO 9001:2008 enables continuous improvement of your organisation's quality management systems (QMS) and processes. In turn, this improves the ability of your operations to meet customer requirements and expectations.

Improving your organisation's Quality Management Systems can positively boost your profitability. Demonstrating real commitment to product and service quality can transform your corporate culture because, as a result, employees understand the requirement for ongoing improvement.

ISO 9001:2008 is based on eight quality management principles:

- Customer focus
- Leadership
- Involvement of people
- Process approach
- System approach
- Continual improvement
- Fact-based decision making, and
- Mutually beneficial supplier relationships

Quality Management System certification from SGS will help your organisation develop and improve performance. ISO 9001:2008 certification enables you to demonstrate high levels of service quality when bidding for contracts and a valid ISO 9001:2008 certificate shows that your organisation follows internationally recognised quality management principles.

Certificate GB06/70588.03

The management system of

Tradebe Environmental Services Limited

Tradebe Gwent Limited - Bridgend Waste Management Centre
Factory Lane, Pencoed, Bridgend, CF35 5BQ, UK

has been assessed and certified as meeting the requirements of

ISO 9001:2015

For the following activities

Provision of services to hazardous & non-hazardous waste producers,
including:
Collection, transportation, disposal, recycling, recovery & treatment
processes.

Further clarifications regarding the scope of this certificate and the applicability of
ISO 9001:2015 requirements may be obtained by consulting the organisation

This certificate is valid from 14 November 2016 until 14 November 2019 and
remains valid subject to satisfactory surveillance audits.
Re certification audit due before 28 October 2019
Issue 11. Certified since 04 December 2006

Multiple certificates have been issued for this scope
The main certificate is numbered GB06/70588.00

Authorised by

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SGS 9001 2015 0216

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SGS



ISO 14001:2004 - ENVIRONMENTAL MANAGEMENT SYSTEMS

How can you demonstrate environmental responsibility?

Customers, consumers and shareholders are increasingly concerned over the environmental impact of their activities, their products and the services they consume. They expect companies to comply with environmental standards and demonstrate their commitment to reducing their environmental impacts in daily operations. That may be a challenge, but it is also an opportunity for you to demonstrate your environmental responsibility, stand out from the competition and show existing and potential customers the proof of your commitment.

THE BENEFITS

- Manages environmental aspects effectively
- Improved compliance with environmental legislation
- Prevention of pollution
- Minimises energy and resource usage reducing operating costs
- Continual improvement in environmental performance
- Reduces the risk of penalties and avoids litigation
- Increased stakeholder confidence
- Improves employee morale
- New business opportunities with environmentally aware customers

Demonstrate high levels of environmental compliance when bidding for international contracts/expanding locally to accommodate business.



OHSAS 18001 - OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS

Put your employees' safety and well-being at the top of your organisation's agenda with the implementation of OHSAS 18001:2007.

Sound occupational health and safety policies are essential for employees, but they are also increasingly important for your customers and other stakeholders. Occupational Health and Safety Management systems certification to OHSAS 18001 is a strong sign of your organisation's commitment to your employees' health and safety.

Many organisations implement an Occupational Health and Safety Management System (OHSMS) as a fundamental part of their risk management strategy to address changing legislation and protect their workforce and other persons working under their control.

OHSAS 18001 certification enables organisations to manage operational health and safety risks and improve performance.

OHSAS 18001:2007 addresses the following key areas:

- Hazard identification, risk assessment and determining controls
- Legal and other requirements
- Objectives and OHS programme(s)
- Resources, roles, responsibility, accountability and authority
- Competence, training and awareness
- Communication, participation and consultation
- Operational control
- Emergency preparedness and response
- Performance measuring, monitoring and improvement

Working with SGS to audit and certify your occupational health and safety system will promote a safe and healthy working environment.



1. Site discharge conditions/consents.

Within the installation permit there are discharge limits for the emissions to sewer. This sewer discharge is also subject to a trade effluent consent from Dwr Cymru (DCWW)

The condition in the permit states:

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 4 tables S4.1, S4.2 and S4.3.

Table S4.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (incl. Unit)*	Monitoring frequency	Monitoring standard or method
Final effluent discharge point S1	Daily Discharge	Rainfall related uncontaminated installation run off and Treated Waste Water	1400 m ³ /day (700 m ³ /day Trade effluent /700 m ³ /day Septic Tank Waste)	Continuous ¹	To be agreed with the Agency
	Peak Flow Rate		10 l/s	Continuous ¹	
	pH		6-10 pH units	Spot sample per batch	
	Total Suspended Solids		1,700 mg/l	Spot sample per batch	
	COD		No limit set	Spot sample per batch	
	Temperature		43 °C	Spot sample per batch	
	Oil & Grease		100 mg/l	Spot sample per batch	
	Total Sulphate		1000 mg/l	Spot sample per batch	
	Total NH ₃ -N		500 mg/l	Spot sample per batch	

Total Chromium	2 mg/l	Spot sample per batch
Total Copper	2 mg/l	Spot sample per batch
Total Lead	2 mg/l	Spot sample per batch
Total Nickel	2 mg/l	Spot sample per batch
Total Zinc	2 mg/l	Spot sample per batch
CN	2 mg/l	Spot sample per batch
Total Sulphide	3 mg/l	Spot sample per batch
Monohydric Phenols ²	100 mg/l	Spot sample per batch
Manoxal OT	30 mg/l	Spot sample per batch

- Note 1: Batches pumped to sewer. Discharge volume recorded by meter.
- Note 2: Increase in Phenol concentration up to the maximum limit should not exceed 10mg/l in any one day.
- * NB: The limits in this table are interim levels to be revised upon discharge of Improvement Programme Table S1.3(4).

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IP1	The Operator shall produce and implement written procedures (and any amendments to them) that accord with section 2.1.1 of Sector Guidance Note S5.06, December 2004, to assess waste prior to acceptance on the site.	4 July 2008
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.	4 July 2008
IP3	The operator shall provide and maintain monitoring of effluent flow to sewer to the MCERTS standard. A copy of the first MCERTS site conformity inspection certificate shall be submitted to the Environment Agency.	4 April 2009

Variation Number YP3437XU

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Bridgend Waste Management Centre

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IP4	Undertake an assessment of the impact on the water environment from current emissions of effluent to sewer. The operator shall use the methodology prescribed in the Agency's guidance 'Environmental Assessment and Appraisal of BAT' (Ref. IPPC H1) in making this assessment. The Operator shall identify substances present in the effluent that are considered significant, and submit proposed emission limit values for these substances in the form of a report. Flow rate must also be considered as part of this assessment. The report shall also include an effluent monitoring plan for any key substances identified and an action plan to reduce releases of those substances that are considered significant as part of the H1 Assessment. The operator shall implement any improvements or measures identified. Once approved, the limits and parameters should supersede those prescribed in table S4.4 of this permit.	4 Oct 2008

The DCWW consent

**Direction N° 4 of SW502
(2016)**

**DWR CYMRU CYFYNGEDIG
THE WATER INDUSTRY ACT 1991
NOTICE OF DIRECTION VARYING A CONSENT
TO DISCHARGE TRADE EFFLUENT INTO A PUBLIC SEWER**

DWR CYMRU CYFYNGEDIG ("the Undertaker") in the exercise of its powers under Section 121 of the Water Industry Act 1991, and thinking it fit to impose conditions as hereinafter appear, **GIVES ITS CONSENT** to the discharge of trade effluent for the said trade premises into the Undertaker's public sewers, **SUBJECT TO THE FOLLOWING CONDITIONS AND NOT OTHERWISE**

- (5) The Trade Effluent shall not include any substances or properties listed in the SECOND or THIRD SCHEDULE hereto in concentration greater than stated therein. The discharge shall not contain and 'dangerous substance' as listed in the THIRD SCHEDULE.
-

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- (6) The maximum quantity of trade effluent discharged on any day (being any continuous 24 hour period) shall not exceed **700** cubic metres. In addition, the maximum quantity of uncontaminated cesspit waste or septic tank waste (referred to as 'domestic waste' by Tradebe) discharged on any one day shall not exceed **700** cubic metres. Flow from both these waste streams shall be measured independently by separate flow meters.
- (7) The highest rate at which trade effluent may be discharged shall not exceed **10** Litres per second.
- (8) The trade effluent can be discharged into the public sewer at any time.
- (9) No uncontaminated condensing water shall be discharged.

(10) There shall be eliminated from the trade effluent before it is discharged the matters listed below:

- (a) Effluent with a temperature in excess of 43 degrees Celsius (110 degrees Fahrenheit);
- (b) Calcium Carbide
- (c) Petroleum Spirit within the meaning of Section 111 of the Water Industry Act 1991 and/or the Petroleum Act 1928, save as otherwise permitted herein;
- (d) Other material forming a constituent of the trade effluent, whether alone or in combination with other materials, specified hereby as that which is explosive;
- (e) Any other substance forming a constituent of the trade effluent which is hereby specified as that which is likely to injure the sewers or to interfere with the free flow of their contents or to affect prejudicially the treatment and disposal of their contents;
- (f) Any other substance forming a constituent of the trade effluent which is hereby specified as that which in its pure state or in combination with other

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materials in the contents of the sewer ("the sewage") is capable of producing toxic or flammable vapours.

(11) No trade effluent shall be discharged the pH value of which is less than **6.0** or greater than **11.0**.

SCHEDULE TWO

1. The chemical oxygen demand load discharged in any 24hr period shall not exceed 2500 kilograms.
2. Total free and/or emulsified Oils and Grease shall not exceed 100 milligrams per litre.
3. Total suspended solids shall not exceed 1700 milligrams per litre.
4. Total Sulphate shall not exceed 1000 milligrams per litre.
5. Total Zinc shall not exceed 2 milligrams per litre.
6. Total Nickel shall not exceed 2 milligrams per litre.
7. Total ammoniacal nitrogen shall not exceed 1500 milligrams per litre (expressed as N). Total ammoniacal nitrogen load discharged in any one day (being a continuous 24 hour period) shall not exceed 200 kilograms from the 1st April until 31 October (summer months). Total ammoniacal nitrogen load discharged in any one day (being a continuous 24hr period) shall not exceed 280 kilograms from the 1st November until 31st March (winter months).
8. Total Copper shall not exceed 2 milligrams per litre
9. Total lead shall not exceed 2 milligrams per litre
10. Total Chromium shall not exceed 2 milligrams per litre
11. Total soluble sulphide or compounds producing hydrogen sulphide on acidification shall not exceed 3 milligrams per litre
12. Total cyanide or compounds producing hydrogen cyanide upon acidification shall not exceed 2 milligrams per litre (expressed as CN)
13. Monohydric phenols shall not exceed 100 milligrams per litre (expressed as phenol) Increase in phenol concentration up to a maximum limit should not exceed 10 milligrams per litre in any one day (being any continuous 24hr period) .Increase in phenol load loading shall not exceed 7 kilograms in any one day.
14. Anionic synthetic detergents concentration shall not exceed 30 milligrams per litre

Mark Griffiths had informed NRW of the new DCWW consent via email back in 5/7/16 at this time the advice given in the CAR form **CAR_NRW0023756** stated:

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

I have highlighted the NM of table S4.3 in yellow above for ease of reference.

Pre-application advice was now being sought by Tradebe and is discussed in the agenda item below.

FT has consulted with the permitting team and is awaiting their reply (see action under heading 4 below)

1. Permit pre-app advice.

See section 3 above and 6 below that have relevance to this aspect.

In order not to delay the provision of pre-application advice (pending confirmation from the permitting team on the need for an application) below I have included links to our permitting pages and charges that will assist you in permitting application works.

<https://naturalresources.wales/permits-and-permissions/installations/apply-to-vary-change-a-permit-for-installations/?lang=en>

Above is the link to applying to vary your permit. The page also advises that “you can apply to consolidate your permit. If you would like to consolidate your permit, then please contact our customer contact centre on 0300 065 3000 to discuss your application.”

To the right of the above linked page are guidance documents that you may wish to refer to.

<https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/our-charges/?lang=en>

The above link directs you to our charging page. The charge for your permit variation (or consolidation) would be based on the sites OPERA score. At the bottom of the above linked page you can find a template to complete an up to date OPERA and guidance documents. Undertaking a OPERA review will give you an idea of the costs involved as these are calculated for you on the last tabs of the OPERA spreadsheet.

ACTION FT: once confirmation received from permitting over the requirements to vary the emissions to sewer conditions/limits inform Tradebe.

1. Site safety – review of DESEAR

NRw hold a safety sheet for all operational sites regulated by the SW Waste regulation team. These sheets are routinely checked and updated. Following 2 incidents at AD sites it became apparent that we needed to better understand the DSEAR risks of all our sites.

To that end Tradebe were asked to confirm the DSEAR assessment of the bridgend site. Email confirmation was received on 19/6/17 stating:

With regard DSEAR for Bridgend, at Gwent we undertook as DSEAR Compliance Project with a specialist company called ProJen.

This involved gathering all our data on everything that we accepted at all our sites with our Technical Assessment Team (TAD) and reviewed what products we were accepting at our sites.

From this it was identified that nothing that goes into Bridgend falls within DSEAR, ProJen agreed.

The NRW safety sheet was reviewed, saved update 6/7/17.

1. Pre acceptance cross reference with How to comply, SGN 5.06 and Waste treatment BREF BAT to satisfy Improvement Condition item IP1.

The permit condition 2.5.1 states “The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing.

The table includes an IP that states:

The operator shall produce and implement written procedures (and any amendments to them) that accord with section 2.1.1 of Sector Guidance note S5.)[^] December 2004, to assess waste prior to acceptance on site.

My review of the site file could not confirm if this improvement item had been completed and signed off.

I therefore undertook to review the sites pre-acceptance procedures and cross reference them against the current relevant guidance documents. I referenced How to comply, SGN 5.06 and the BREF Bat's

Below are a summary of these documents and how they interlink.

How to comply

This document includes general guidance about conditions and some activity specific guidance. For some activities you will need more information to understand what you need to do. This is covered in the sector technical guidance notes listed in **Part 7** – Where to find more information page 92. If there is conflict between the sector technical guidance and this document, the sector guidance will apply.

Sector Guidance Note S5.06

Guidance for the Treatment and Transfer of Hazardous Waste

Background

This document 'Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste S5.06' was published in 2004, two years before the adoption of the Waste Treatments Bref. Despite this, the requirements of the Waste Treatments Bref mostly mirror those of S5.06. Some of the legislation and referenced guidance has been amended since S5.06 was published and users naturally reference the amending legislation.

Applicability of S5.06

S5.06 was drafted and published when there was parallel 'Best Practice Guidance' for waste management licensed activities¹. With the advent of the Environmental Permitting regulations, new 'Waste Operation' permits referenced S5.06 where relevant and the 'Best Practice Guidance' was withdrawn. Fundamental revisions to waste management legislation (ie. the Hazardous Waste Regulations requires that Best Available Techniques' (BAT) is used for mixing of hazardous waste and the implementation of the Waste Hierarchy) has more closely aligned 'installations' and 'waste operations'. As the principle objective is to prevent accidents and minimise their consequences BAT generally equates to 'appropriate measures', with the only notable exception of Energy Efficiency.

Current Position

Regulated facilities or exempt facilities that transfer or treat hazardous waste are expected to meet the requirements of S5.06, whether they are allocated to the 'Hazardous Waste Sector' or another sector.

Implementation of Industrial Emissions Directive (IED)

The implementation of the IED will see the continued use of S5.06, EPR 5.07 (clinical waste) and the Waste Treatments Bref as the initial points for defining 'appropriate measures'. The development of the revised Bref may re-define BAT at some point in the future. Once the revised Bref is adopted we will have 4 years to implement any changes.

The Waste treatment BREF section 5.1 covers waste in and out put BAT.

Tradebe have previously supplied documentation of their waste acceptance procedures. These were received as email on 1/7/16 and again as hard copy during this site visit. Tradebe have also produced a presentation that fully details the pre-acceptance procedure which references SGN5.06 and meets the requirements. The presentation was shared via email received 5/7/17.

Having assessed these documents and checked the sites operational understanding I can confirm NRW are satisfied that the requirements of IP 1 have been met.

This acceptance confirms that all items within table S1.3 have now been completed.

This action has significance in relation to the emission conditions and table S4.3 as the note assigned to the table states that the emission limits are interim and to be revised upon discharge of the improvement programme.

I have raised this aspect with the installation permitting team, and at time of completing this CAR form am awaiting a response on the way forward with regards to permit review or variation application requirements.

1. Site inspection – waste storage areas, plant operations, bunds.

The site inspection found a very high standard of hose keeping. All bunds inspected were in good condition. IBC's were stored within the bunded area. Waste oil separation equipment was in good order and had recently undergone maintenance/cleaning. Holding tanks were in the process of being de-sludge.

No non compliances were noted during the inspection.



site ID board with safety record.



IBC storage area

Waste oil processing



Newly build (repair) bund at leachate holding tanks.



Painted internal bund walls





Effluent discharge up turned pipe as per MCERS audit recommendations to ensure maintained full flow within pipe.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0031849**

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	14/06/2017

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 report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen 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.