

Compliance Assessment Report CAR_NRW0040524

Permit being assessed: NP3233XX.

For: Bridgend Waste Management Centre, held by Tradebe Gwent Limited

At: Factory Lane, Pencoed, BRIDGEND, CF35 5BQ.

Type of assessment carried out: Audit, Reason: Other.

On 11/10/2022.

Parts of permit assessed: all

NRW Lead Officer: Geraint Harris.

Report sent to: Alex Morris, Site Manager on 11/10/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

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

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Tradebe Bridgend

EPR/NP3233XX

Tradebe's permit has been varied following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Waste Treatment. The associated BAT conclusions to this document were published on 17 August 2018 in the Official Journal of the European Union. This variation incorporates the

changes required by the Industrial Emissions Directive following a statutory review of permits in the Waste Treatment sector. As part of this variation and to ensure that Tradebe are operating to the latest BAT requirements, Tradebe were required to submit responses to two improvement conditions by February 2022. Since this deadline, the responses have been reviewed along with additional information that was requested as the review progressed. A summary of the improvement condition responses are detailed below:

Improvement condition 5

Improvement condition 5 incorporates a number of BAT conclusions. These will be addressed individually.

BAT 1 – The Operator shall confirm that a Residues Management Plan, Accident Management Plan, Odour Management Plan and Noise & Vibration Management Plan have been finalised and are formal documents within the sites Environmental Management System.

In their response to BAT 1 Tradebe supplied the following documents:

- PBEN 107 Residue Management Plan,
- PBEN 105 Odour Management Plan,
- PBHS 101 Emergency Preparedness and Response Plan
- PBEN 106 Noise & Vibration Plan.
- PBHS 106 Spill response
- PBHS 107 Site security Management Plan
- PBRH 100 The Reception, Inspection, routing Storage of Bulk Waste 2015
- PBLA 122 Determination of compatibility for the blending of materials
- PBLA 121 Pre -acceptance analysis Technical Evaluation
- FBLA 009 Caveats for Physico-Chemical Treatment Material
- Tradebe Bridgend FRA
- Major Accident Prevention Policy
- Tradebe UK Occurrence Reporting Management Rev. 1.0

Using sections 2.3.12, 2.3.13.1, 2.3.5.1 and 2.3.10.1 of the Waste Treatment Bref as guidance, I can confirm that the information within the documents listed above satisfy the requirements of BAT1.

BAT 3 – In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of wastewater and waste gas streams, as part of the Environmental Management System, that incorporates all of the following features:

A. Information about the characteristics of the waste to be treated and the waste treatment processes;

In their response to BAT 3, Tradebe provided document 'PBPR 105 Treatment Processes & Operation'. This document provides information about the treatment processes and waste that can be treated. Tradebe state that all incoming waste undergoes acceptance and pre acceptance analysis to determine suitability for the process and validation on arrival. The data from such analysis can be found on SAP.

B. information about the characteristics of the wastewater streams;

The site is well established and has operated for a considerable number of years under an environmental permit. As a result, they have a clear understanding of the characteristics of their wastewater streams. Wastewater stream generation at site, is in the form of a trade effluent which is discharged to sewer, the effluent is monitored in line with PBPR 100 Monitoring & Sampling of Final Effluent, and all analysis is stored on their SAP system.

C. information about the characteristics of the waste gas streams.

Due to the nature of the treatment processes and the waste accepted for treatment, as outlined in procedure, PBPR 105 Treatment Processes & Operation of the DAF Plant, there are no emission to air points associated with the site. This response has been accepted.

The responses to BAT conclusion 3 have been accepted.

BAT 8 – Monitoring of relevant emissions to air is to be reviewed once completion of the waste gas inventory has been undertaken (BAT 3). Upon completion of this review, the Operator will confirm that there remains no emission source to air in regard to BAT 53.

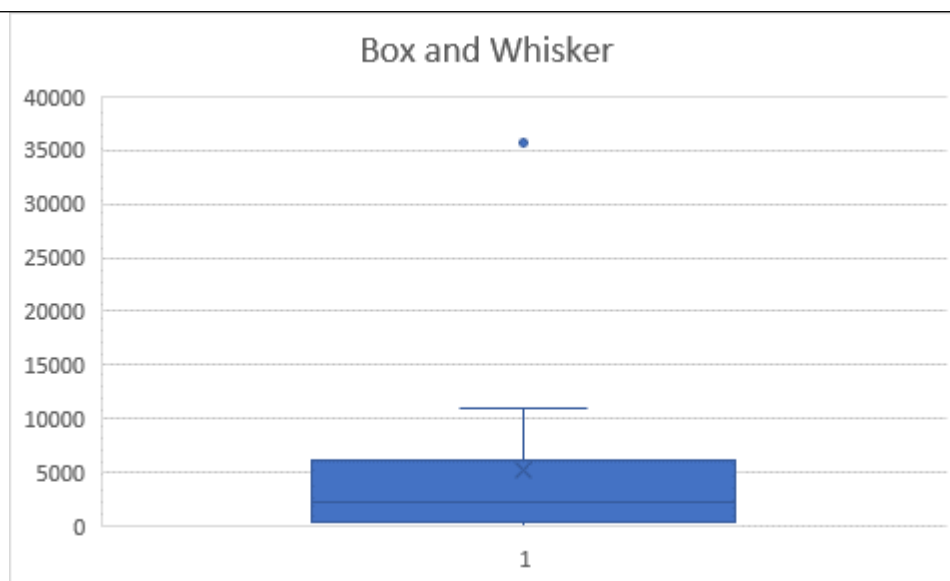
All liquids are stored within sealed tanks and the treatment process is undertaken in an open top Daff plant. Therefore, it is not possible to undertake an inventory of gases. Bat 8 is not considered relevant to this permitted site and is complete.

The Operator shall submit for written approval a methodology for monitoring the relevant process parameters listed in Schedule 3b Table S3.3. The methodology shall identify each of the relevant process parameters listed and identified in the wastewater inventory (BAT 3) and detail the frequency and techniques in place to record the data (outlined in BAT 7 and BAT 20). Where a process parameter cannot be monitored justification should be provided and/or a suitable alternative proposed. The methodology should include trigger levels for each of the relevant parameters identified with associated procedures in place if trigger levels are exceeded.

Tradebe have detailed the method in which the site will monitor parameters listed in Schedule 3b Table S3.3 in procedure PBPR 100 Monitoring & Sampling of Final Effluent and excel sheet Effluent Monitoring Program. BAT 7 states “If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality”. The method for monitoring each of the parameters listed in the excel sheet ‘Effluent Monitoring Program’ has been accepted.

Tradebe have had a number of new substances added to their existing effluent monitoring regime as a consequence of the publication of the WT Bref. BAT Conclusion 7 outlines the required monitoring frequencies for these new and existing substances. Within the subtext at the bottom of the table in BAT 7 it states, “Monitoring frequencies may be reduced if the emission levels are proven to be sufficiently stable”. Tradebe have provided approximately 15 sets of data for file AOX-HOI-BTEX and compared them with the BAT-AEL’s for indirect discharges to a receiving water body in BAT Conclusion 20. The monitoring results for AOX and BTEX are sufficiently low enough and stable enough that Tradebe can monitor these parameters on a quarterly basis. The results for Hexavalent Chromium are also considered low and stable enough that they can also be monitored Quarterly.

Tradebe have requested that the monitoring of HOI be extended to a Quarterly regime. The quarterly monitoring results for HOI ranged between 0 and 35,700 ug/l. The BAT AEL for this substance is 10,000ug/l as stated in BAT Conclusion 20. To ascertain if the 16 monitoring results provided by Tradebe were sufficiently low and stable enough a non-parametric and robust statistical outlier test was undertaken. The data is illustrated below in a “Box and Whisker” plot which Clearly shows the highest monitoring result to be an outlier. The full range of data just exceeds the BAT AEL but the inter-quartile range is well below the BAT AEL. A 95% confidence level is typical for regulatory purposes. Such a figure consistently appears in legislation e.g. IED and in published monitoring guidance. The 95% confidence level for this data was calculated and found to be within the BAT -AEL. Taking all of the above into account it has been decided that the results for HOI are low and stable enough to allow Tradebe to change the monitoring regime from monthly to quarterly.



Trigger levels and the associated actions are detailed in document 'PBPR 100 Monitoring & Sampling of Final Effluent (003)'. The document states that if the trigger levels are reached, the site management must hold a meeting and decide on the actions required to avoid reaching the maximum limit in the discharge by considering stopping the discharge, changes to the treatment, checks on filter presses and other equipment, re-treatment of the held effluent or treatment sludges, or further controls. Trigger levels and actions are detailed for each parameter detailed in Schedule 3b Table S3.3. This response is deemed satisfactory for this section of improvement condition 5.

Improvement Condition 6

The Operator shall complete and submit for approval a Phase 1 screening test report for priority hazardous pollutants and any other relevant priority hazardous substances discharged to sewer. For any substance which is not screened out by the screening tests, further modelling (as described in the risk assessment guidance "Surface water pollution risk assessment for your environmental permit") should be undertaken, and the results of the modelling submitted to Natural Resources Wales for approval.

An update on NRW's position relating to abatement will be released shortly. However, to ensure consistency, the following footnote shall be added to those underneath **Table 3.3 in Schedule 3 (b) – Emissions and monitoring effective from 17th August 2022** in V005 of Tradebe's EPR permit NP3233XX.

"In the case of an indirect discharge to a receiving water body, the BAT-AELs may not apply if the downstream wastewater treatment plant abates the pollutants concerned, provided this does not lead to a higher level of pollution in the environment."

The footnote above will be added to the permit as part of any future variations. NRW do not propose to vary the permit at the moment.

PLEASE KEEP THIS CAR FORM WITH THE PERMIT AS EVIDENCE THAT THE FOOTNOTE ABOVE IS APPLICABLE FROM THE ISSUE DATE OF THIS CAR FORM."

NRW have received Tradebe's initial H1 assessment. Upon review there are a number of pollutants that

exceed the EQS limits. Further work is required to demonstrate that these pollutants are abated at the downstream wastewater treatment plant. Since NRW are still in the process of updating their position on third party abatement this improvement condition is ongoing.

End.

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.