

Compliance Assessment Report CAR_NRW0041275

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: Report/Data Review, Reason: Routine.

On 17/02/2023 - 20/02/2023.

Parts of permit assessed: Monitoring Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Alex Morris, Site Manager on 20/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	permit condition 4.2.2

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

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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

2. What action is required?

Criteria	Action needed	Complete by
G4	There are two lines within form Performance1 for hazardous waste treated. Is this correct? If so, please can you explain why there are two? If it's a mistake, please can you edit the form and resubmit to NRW	31/03/2023
B1	Please provide NRW with a timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan as soon as possible.	31/03/2023
G4	Please ensure your management system reflects the permit requirements so that there are no repeated late submissions going forward.	31/03/2023

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

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

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

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

4. Details of our assessment

Tradebe Bridgend

EPR/NP3233XX

Tradebe's permit was varied in 2021 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 17th of 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. These changes were implemented on the 17th of August 2022. As a consequence of this the reporting requirements along with the subsequent reporting forms have changed.

Annual Performance Report 2022

This brief report covers the 5 sub points required by p.c. 4.2.2. This report discusses the flow monitoring, composite sampling and subsequent analysis (at Bridgend and Newport), use of third-party laboratories for QC/QA and the DCWW sampling and analysis. Waste inputs and outputs are recorded on the Tradebe integrated system. Quarterly waste returns are submitted to the Regulator. Permitted tonnages of waste annual throughput are 115,000 tonnes (with no more than 75,000 tonnes being hazardous), with waste input being declared as 26,631 tonnes of for 2022. Out of this approximately 97 tonnes of oil was recovered. The raw materials used (flocclulants and coagulants) are given. In 2022 permission was granted to Tradebe to undertake trials using a using a screw press to treat oily sludges. Tradebe are optimistic that this will commence in 2023. The installation of solar panels was reviewed and considered in 2022. However, Tradebe state that this was not considered to be economically viable, with continued energy price increases this will be reviewed again in 2023.

Action1: There are two lines within form Performance1 for hazardous waste treated. Is this correct? If so, please can you explain why there are two? If it's a mistake, please can you edit the form and resubmit to NRW. **Due 31st March 2023.**

Total amounts of hazardous waste treated	26,631
Total amounts of hazardous waste treated	19,523

A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31st of January each year (permit condition 4.2.2). An email chasing this information was sent on the 2nd of February 2023 and the information was finally received on the 17th of February 2023. Since no other date was agreed with NRW prior to the 31st of January deadline this is considered a minor

noncompliance. Since there is no environmental impact as a result of this late submission, Tradebe are only being issued with a **minor category 4 noncompliance**.

Discharges To Sewer Returns (FORM Sewer1):

NRW received the 6 monthly monitoring returns for effluent discharge to sewer on the 31st of January 2023. The returns were recorded against the old permit limits using the existing forms. Tradebe were asked to resubmit the monitoring returns using the new forms with the new emission limit values. These were received on Friday the 17th of February 2023. Out of all the various substances/parameters monitored, only Arsenic was in a higher concentration than the permitted ELV's. Tradebe, responded to this permit exceedance by highlighting a CAR form (CAR_NRW0040320) sent to the Tradebe Newport site on the 24th of August 2022. This CAR Form has delayed the implementation of the BAT AELs given in Table S3.3 until 1st September 2023, as long as Tradebe Newport provide NRW with a timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan. Tradebe Bridgend have also asked for a similar approach. The following response was sent by NRW on the 20th of February 2023.

"NRW are only prepared to delay the implementation of the BAT AELs given in Table S3.3, as long as the operator provides NRW with a timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan. NRW will require Tradebe to undertake the required monitoring within the required frequency as stated within BAT 7 and CAR_NRW0040524. Tradebe must submit 6 monthly monitoring results to NRW for all the parameters given in Table S3.3 of their permit using the latest issue of form S1. Non-compliances will be recorded against the parameters given in Table S3.3 and suspended, provided that they are within the limits set by DCWW. Failure to complete the planned ETP improvements within the set time will result in the suspensions being lifted and the scores being applied. Any emissions above these limits must be reported as soon as they are discovered using the Schedule 5 Notification procedure. NRW may, at their discretion, reconsider these decisions at any time.

NRW issued a CAR Form on the 11th of October discussing Tradebe's responses to the Waste Treatment Bref related improvement conditions. Since at the time of the high Arsenic recording (21/09/2022) there was still some ambiguity around the implementation of the BAT conclusions, NRW will not issue a noncompliance score. However, from this point onwards, Tradebe need to be aware that without any detailed plan to improve the emissions to sewer, NRW will have to score any ELV exceedances, against BAT AEL's, in line with our current compliance classification guidance".

Action2: Please provide NRW with a timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan as soon as possible. **Due 31st of March 2023.**

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.

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. Tradebe have stated that this additional work has been commissioned for Q1 2023.

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.