

Compliance Assessment Report CAR_NRW0041686

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 05/04/2023 - 18/04/2023.

Parts of permit assessed: Monitoring Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Alex Morris, Site Manager on 18/04/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E4 - Emissions - Sewer	C3 Minor (Suspended)	Permit condition 2.5.1
E4 - Emissions - Sewer	C3 Minor (Suspended)	Permit condition 2.5.1

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

Total number of non-compliances recorded	Total non-compliance score
2	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?

Criteria	Action needed	Complete by
E4	Complete the improvements to the ETP as agreed	01/10/2023
E4	Action 1: Please provide a plan and timeline for completing IC6. Due 18th May 2023.	18/05/2023

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

The following actions are taken from C.A.R Report CAR_NRW0041275.

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.**

Tradebe confirmed that this was a mistake and that the real figures are in the table below. Consequently, a new Performance1 form was submitted to NRW. Action 1 is considered complete.

Total amounts of hazardous waste treated	4,300
Total amounts of non-hazardous waste treated	22,331

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.**

NRW appreciate that Tradebe will have to make significant changes in order to meet the BAT AEL's consistently. Since we are now passed the BATC implementation date of the 17th of August 2022 a non-compliance has to be issued. NRW are prepared to delay the implementation of the BAT AELs given in Table S3.3, as long as a suitable timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan is provided. Since Tradebe have stated that they "will be in a position to comply with the conditions set out in the permit by September 2023" the score is being suspended until the 30th of September 2023. If Tradebe fails to complete the required work the suspension maybe lifted, and the score applied.

Since Tradebe are unable to meet the requirements of BAT 20, a non-compliance category 3 is being issued against permit condition 2.5.1, since the BATC implementation date in August has now passed.

NRW will require Tradebe to undertake the required monitoring within the required frequency as stated within C.A.R. Report CAR_NRW0040524 and BAT 7. Tradebe must submit quarterly 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's Trade effluent consent. 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.

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. In their most recent update Tradebe have said that the following "we are working with a consultant regarding the modelling required outlined in IC6 of our permit and are waiting for the work to be complete. We have been asked to verify some information submitted to the consultant and once this is completed, we should be able to submit the outcome to you as requested". On the 11th of April 2023 a discussion was had with Tradebe's consultant. Currently the Limit of detection for a number of analytical results is too high, which means when these figures (at the LOD) are entered into the model they are not screening out. NRW require Tradebe to either reanalyse these substances using a method with a lower LOD or provide another suitable and equivalent solution.

Since we are now passed the implementation date of the 17th of August 2022 for this improvement condition a non-compliance has to be issued. Since Tradebe are working towards completing this improvement condition this score will be suspended provided Tradebe provide a plan on how they intend to complete this work and a timeline for finishing it. If Tradebe fails to complete the required work the suspension maybe lifted, and the score applied. **A non-compliance category 3 is being issued against permit condition 2.5.1, since the BATC implementation date in August has now passed.**

Action 1: Please provide a plan and timeline for completing IC6. **Due 18th May 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.