

Compliance Assessment Report CAR_NRW0043332

Permit being assessed: SP3531SK.

For: Gwent Waste Management Centre NRW/EPR/SP3531SK/V007, **held by:** Tradebe Gwent Limited

At: Gwent Waste Management Centre Corporation Road, Corporation Road, Newport, NP19 4RD.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 05/02/2024.

Parts of permit assessed: 4.2.2 Annual Reports 2023; 4.2.3 Emissions to Sewer.

NRW Lead Officer: Rebecca Green.

Report sent to: Alex Morris, Site Manager, on 07/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Information - Reporting	Action only (X)	
IR1A - Management - General management	Assessed (A)	
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	

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

Total 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?

Criteria	Action needed	Complete by
IR4B	Annual Reports to be sent to NRW by 31st January each year	31/01/2025

Compliance 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

Forms S1, Emissions to Sewer, 1st October to 31st December 2023 and SC1, Scrubber Operation, 1st July to 31st December 2023, Energy1 2023, WaterUsage1 2023, P11 Performance Indicators, 2023 and the Performance Report for 2023 were all received on 5th February 2024. All the reports are accepted.

S1, Emissions to Sewer, 1st October to 31st December 2023

There are no emission limit values (ELV) in the permit for emissions to sewer.

SC1, Scrubber Operation, 1st July to 31st December 2023

pH values for SC1, SC2 and SC3 are all within their respective ELVs.

From 17th August 2022, Tradebe were no longer required to report this process monitoring data to Natural Resources Wales (NRW), see Permit Schedule 3b, Table 3.4. The data should be recorded and available on site for inspection by NRW.

Energy1, Energy Usage 2023

Total overall energy use was lower than in 2022, decreasing by about 15% per tonne of accepted waste (ptaw). Electricity consumption ptaw was about 16% less and total consumption was also less than in 2022. Gas consumption was higher than in 2022 but fell slightly ptaw. This year it has not been possible to quantify oil consumption because the site is using white diesel for the site vehicles as well as site operations. Tradebe will install a meter so that the fuel used for vehicles can be measured.

Water1, Water Usage 2023

Total water consumption increased and use ptaw rose by about 16%. This was mainly due to process trials and the need to decontaminate a treatment tank.

PI1, Performance Indicators 2023

Total annual production/waste accepted was about 9% higher than in 2022.

The total amount of hazardous waste accepted was about 30% lower than in 2022, returning to the amounts seen in 2021. Slightly more non-hazardous waste was accepted than in 2022.

No hazardous waste was sent to landfill. Non-hazardous waste sent to landfill decreased by about 8% ptaw.

Discharges to sewer were much higher than in 2022, increasing by almost 40% ptaw because more watery wastes and leachates were treated.

Performance Report 2022

Tradebe underwent an MCERTS audit in May 2023. The next re-certification audit is due in May 2027. The meter is verified and serviced annually.

The weighbridge was calibrated in September 2023.

Waste accepted continues to be low in solids, resulting in lower tonnages of filtercake. The ratio is slightly less than in 2022.

An MCERTS compliant gantry for monitoring emissions to air has been fitted and air monitoring should be carried out this month (February 2024).

The site did not report any accidents or incidents in 2023.

The increases in water use and discharges to sewer are disappointing, but the causes are known.

Total energy use has decreased and NRW hope that Tradebe will be able to maintain this reduction in 2024.

Tradebe continue to investigate ways of using waste in the treatment processes, contributing to the circular economy and sustainability. NRW encourage Tradebe to continue their innovative approach.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.