

Compliance Assessment Report CAR_NRW0043531

Permit being assessed: NP3233XX.

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

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

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2023.

Parts of permit assessed: Monitoring Returns.

NRW Lead Officer: Geraint Harris.

Report sent to: Alex Morris, Site Manager , on 20/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	C3 Minor	Permit condition 1.1.1
IR4B - Information - Reporting	C4 No impact	Permit Condition 4.2.2
IR4B - Information - Reporting	C4 No impact	Permit Condition 4.2.3
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2 (chromium exceedance Q1)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2. (AOX exceedance Q2)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2 (lead exceedance Q3)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2 (chromium exceedance Q3)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2 (Copper exceedance Q3)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit condition 3.1.2 (AOX exceedance Q4)
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor (Suspended)	Permit Condition 3.1.2 (AOX exceedance Q4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
10	4.2

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
IR1A	Improve EMS to ensure reports are submitted on time.	01/04/2024
IR4B	Provide NRW with the annual performance report as required from permit condition 4.2.2	Already completed
IR4B	Provide NRW with the Q4 reporting data as soon as possible.	Already completed
IR3A	Ensure the modification to the ETP are complete by the end of August 2024.	31/08/2024
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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

Tradebe (Bridgend) Ltd

EPR/NP3233XX

The annual performance report for 2023 and the quarterly monitoring returns were received on the 5th of February 2024. Condition 4.2.2 of Tradebe's permit requires a report or reports on the performance of the activities over the previous year to be submitted to Natural Resources Wales by 31st of January (or other date agreed in writing by Natural Resources Wales) each year. The permit also requires, within 28 days of the end of the reporting period, that the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and

assessment carried out in accordance with the conditions of this permit. Both reports were received beyond these deadlines in 2024. The performance report was also late last year. Therefore, Tradebe was asked to undertake an investigation into the root cause of the failure to meet permit deadlines and to provide a plan on how they intend to come back into compliance going forward.

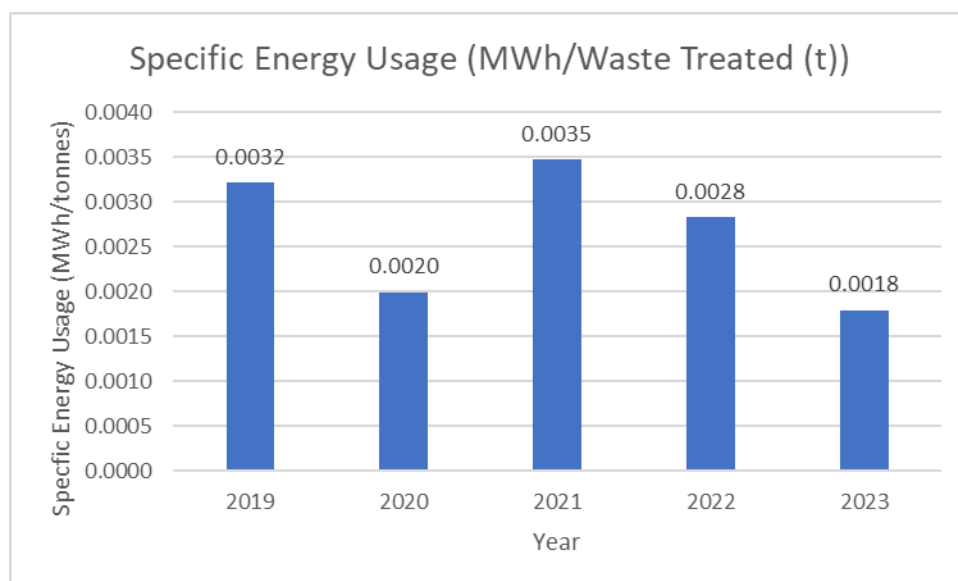
Tradebe responded stating that "all of the returns for Bridgend & Newport sites are currently complied and completed solely by the site manager, with running two busy sites and other yearend commitments the workload is too great for one person. Some of the data gathering and other yearend commitments will be delegated to other members of the management team, moving forward."

Since no alternative submission date was agreed with NRW prior to the 31st of January deadline these are considered to be minor noncompliance's. Since there was no environmental impact as a result of this late submission, Tradebe are being issued with **two minor category 4 noncompliance against permit conditions 4.2.2 and 4.2.3**. However, since this is the second year in a row that such reports have been late a category 3 non-compliance is being issued against the site's environmental management system (1.1.1) for not having systems in place to ensure that all reports are submitted by their due date.

Annual Performance Report (4.2.2)

Energy:

Tradebe reported their specific usage value as the primary energy used per tonne of waste received for that year. The graph below show that Tradebe's specific energy usage was the lowest in 5 years.



The installation of solar panels was reviewed again in 2023 and again not considered to be economically viable. Tradebe reported that all lighting on site has now been changed to LED and new more energy efficient tumble drier and washing machine have been purchased.

Water Usage:

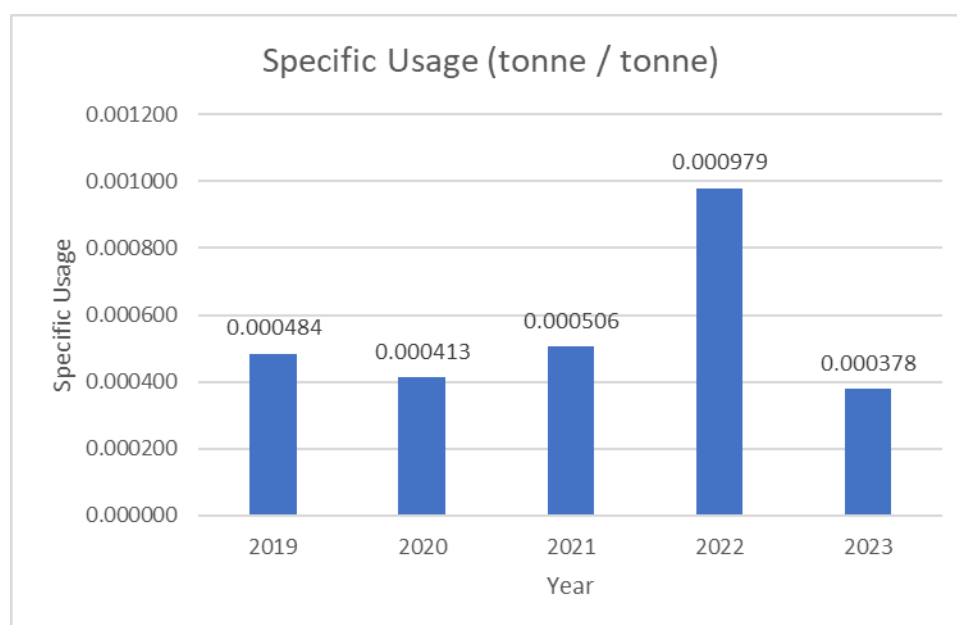
In the past Tradebe were unable to monitor their water usage due to their supply being unmetered. However, a meter has since been installed and Tradebe were able to report that they used 798m³ of water in 2023 which resulted in 0.03 m³ of water consumed per tonne of waste received on site. This figure will be used for future comparisons.

Raw Materials:

The site purchases two different raw materials which are used as treatment reagents: ferric chloride solution, for both pH adjustment and grey water treatment in the DAF plant, and a polyelectrolyte to aid with clarification.

Polyelectrolyte usage is minimal, with 1 x 1000 litre IBC lasting the site in excess of 12 months.

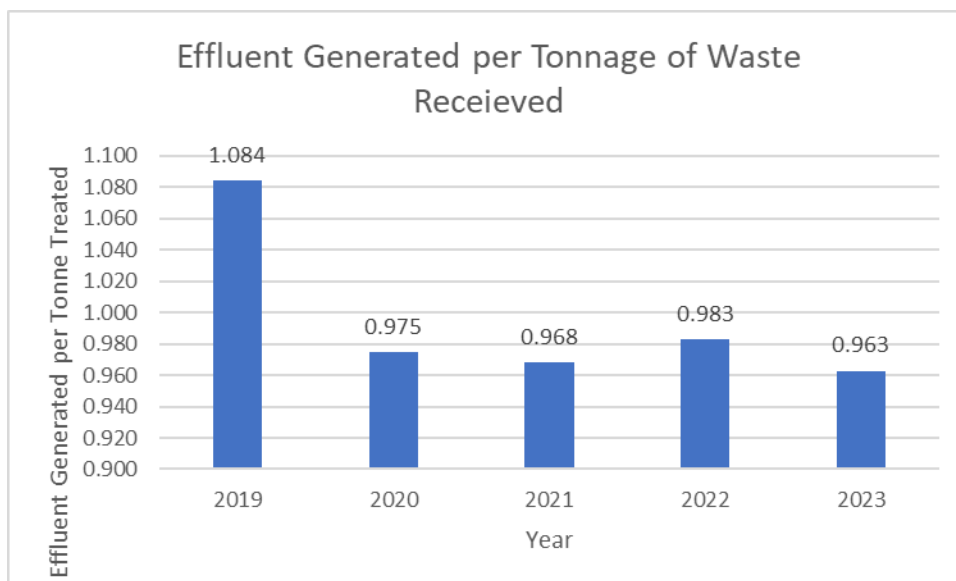
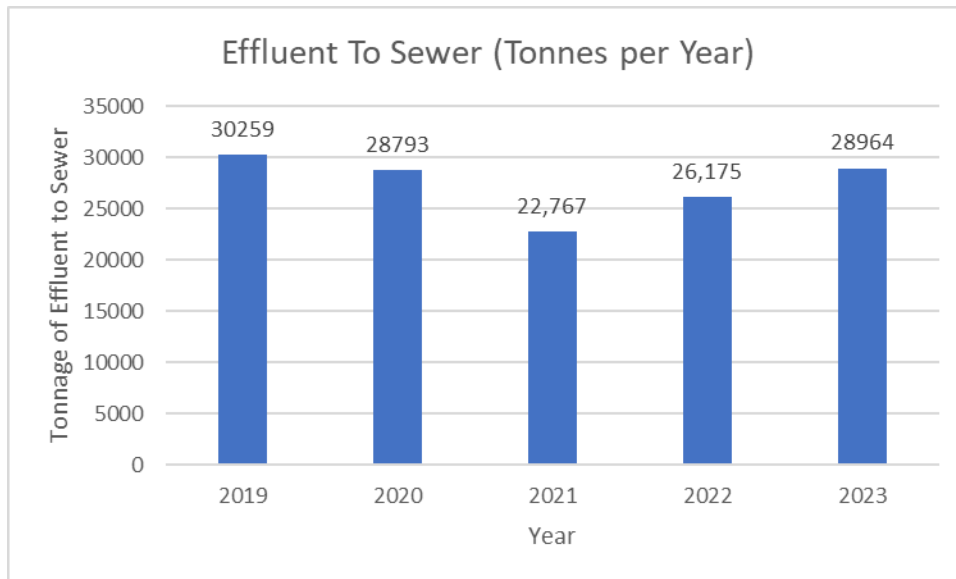
With regards to ferric chloride, Tradebe used 11.368 tonnes in 2023 to treat 30080 tonnes of waste. This resulted in a specific usage of 0.000378 tonnes of ferric chloride per tonnage of waste. The graph below shows the trend in specific usage of ferric chloride over the past 5 years. 2023 shows the lowest specific usage, however, since the quality of the waste can vary from batch to batch it is difficult to relate these figures to process efficiency. Tradebe trialled using waste ferric chloride in place of product ferric chloride, in their DAF process, offsetting the use of a virgin product, however this was unsuccessful due to the inconsistency of the waste, Tradebe will continue to look for other suitable options.



Effluent Discharge:

The effluent discharge monitoring and management systems achieved MCerts recertification 22nd March 2021, with renewal required March 2026. The flow meters are included in Tradebe's PPM system and

undergo external verification annually. The trend in effluent discharge over the past 5 years can be seen in the graph below.



Quarterly Monitoring Sewer Returns

NRW agreed to delay the implementation of the BAT AELs given in Table S3.3, as long as Tradebe provided NRW with a timeline for the installation and commissioning of the modified treatment plant, or an acceptable alternative plan. Consequently, NRW required Tradebe to undertake the monitoring of their discharges to sewer within the required frequency as stated within BAT 7 and CAR_NRW0040524. Tradebe therefore had to 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. It was agreed that any 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 would result in the suspensions being lifted and the scores

being applied. The following non-compliances were reported on 2023:

Q1 (01/01/2023 to 31/03/2023)

Chromium (Cr) measured value of 0.37mg/l against a permit limit of 0.3mg/l

Q2 (01/04/2023 to 30/06/2023)

AOX measured value of 1.08mg/l against a permit limit of 1.0mg/l

Q3 (01/07/2023 to 31/09/2023)

Lead measured value of 0.33mg/l against a permit limit of 0.3mg/l

Chromium (Cr) measured value of 0.4mg/l against a permit limit of 0.3mg/l

Copper (Cu) measured value of 0.8mg/l against a permit limit of 0.5mg/l

Q4 (01/07/2023 to 31/12/2023)

AOX measured value of 1.01mg/l against a permit limit of 1.0mg/l

Copper (Cu) measured value of 0.8mg/l against a permit limit of 0.5mg/l

If a reported result is above the ELV, we will assess whether it complies by taking account of its measurement uncertainty. We do this by subtracting the measurement uncertainty from the measured value. If after completing the assessment the result is still above the ELV, we are likely to consider this as a breach of the ELV. However, if after completing the assessment the result is below the ELV, we are likely to consider this as approaching but not breaching the ELV. The exceedances mentioned above have not had their uncertainty values subtracted from them. It is highly likely that the AOX and Lead exceedances will become compliant when their uncertainty values have been subtracted. However, Tradebe will need to show evidence of this and provide a credible uncertainty value for each of these substances. As it stands no credible uncertainty value has been provided for the substance mentioned above and so these are being considered as breaches and so inline with the agreement mentioned above, will be scored a noncompliance and subsequently suspended. These will remain suspended if the uncertainty value shows they are compliant. They will also remain suspended if the planned ETP improvements are made within the require timeline. Tradebe was asked via email to provide an uncertainty value for their Lead, chromium, Copper and AOX testing, following a request for more time the following action has been issued.

Action1: Please review the uncertainty calculations and values for AOX, Lead, Copper and Chromium. **Due 18th April 2024.**

Waste Returns for 2023:

No non-compliances found.

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.