

Natural Resources Wales permitting decisions

Tradebe Gwent Limited Gwent Waste Management Centre

Decision Document

Contents

Minor Technical Variation	3
Purpose of this document	3
Receipt of Application.....	4
Application receipt and duly making	4
Consultation	4
Request for further information.....	4
Operator	5
The Installation	5
The Site	6
What the Installation does	6
Key Issues in the Determination.....	7
Environmental risk assessment	7
The Permit Conditions.....	8
Incorporating the application	9
Environmental Management Systems (EMS).....	9
OPRA	9

Minor Technical Variation

The variation number is: EPR/SP3531SK/V008

The applicant /operator is: Tradebe Gwent Limited

The Installation is located at: Gwent Waste Management Centre Corporation Road, Newport, NP19 4RD.

We have decided to issue a minor technical variation for the Gwent Waste Management Centre operated by Tradebe Gwent Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Receipt of Application

Application receipt and duly making

The application was accepted as duly made on 03 July 2019. This means we considered it was in the correct form and contained sufficient information to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

Consultation

The application was for a minor technical variation to the permit. Minor technical variations do not require consultation. This decision was taken in accordance with RGN 6, *High Profile Sites*, our Public Participation Statement and our Working Together Agreements.

A copy of the application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

Request for further information

Further information was requested from the applicant to support their application regarding a Non-Technical Summary (NTS), an environmental risk assessment and their amended site plan. The requested was made on 07 June and a response was received via email on 03 July, 2019.

Operator

We are satisfied that the operator, Tradebe Gwent Ltd, will have control over the operation of the Installation after the grant of the varied permit. The decision was taken in accordance with EPR RGN 1, *Understanding the Meaning of Operator*.

The Installation

The Installation is subject to the Environmental Permitting Regulations (EPR) because it carries out a number of activities listed in Part 2 of Schedule 1 of the EPR:

- Section 5.3 A(1)(a)(ii) Physico-chemical treatment (disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day).
- Section 5.3 A(1)(a)(iii) Blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1 (of the EPR).
- Section 5.3 A(1)(a)(iv) Repacking prior to submission to any of the other activities listed in this Section or in Section 5.1 (of the EPR).
- Section 5.4 A(1)(a)(ii) Physico-chemical treatment (disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day).
- Section 5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section (of the EPR).

An Installation may also comprise of “directly associated activities”, that at this Installation includes:

- Cleaning of road tanker vessels & subsequent treatment of aqueous liquids.
- Storage of non-hazardous wastes pending treatment, classification and segregation into waste types during storage.

- Container washing, shredding and crushing and compaction of nominally empty drums and containers.
- Lime silo (lime storage).
- Biological treatment of non-hazardous waste and process effluent.

The Site

An updated site plan was provided by the operator that we consider satisfactory, showing the extent of the site of the facility including the location of the part of the Installation to which this permit applies on that site. The amended site plan is included with the variation and the operator must carry out permitted activities within the site boundary. The permitted site boundary has not changed as a result of this minor technical variation to the permit.

What the Installation does

The installation accepts a wide variety of hazardous and non-hazardous wastes which arrive in containers or in bulk road tankers from mostly industrial sources. The site operates a hazardous waste transfer station and a physico chemical treatment plant. The transfer station accepts a range of waste materials and carries out storage, bulking, repacking and transfer activities. The majority of waste processed through the transfer station is sent offsite for disposal or recovery at other sites in the UK and Europe. The treatment plant processes inorganic waste through neutralisation, redox reaction and precipitation. Process effluent is sampled, analysed and discharged to sewer under permitted conditions.

Air emissions from the permitted Installation, excluding fugitive emissions from the transfer facility, consist of emissions from the boiler used for office heating and from the vent stack situated on top of the main process building. An abatement system comprises of two primary scrubbers for gases produced from the acid neutralisation

and cyanide oxidation tanks, and a secondary scrubber fitted with a fan to extract fugitive emissions from the process tanks and to maintain negative pressure within the process building.

There are no other process emissions, either to controlled waters or to land from the Installation.

Key Issues in the Determination

This variation authorises the addition of a number of European Waste Catalogue (EWC) codes to the list of accepted waste types to the permit and also includes an amended site plan to reflect the current site layout.

The principle EWC code additions apply to the transfer facility where waste is accepted, repacked, bulked and transferred for final disposal or recovery. The additional permitted waste types will expand the waste acceptance capability of the transfer facility. Additional EWC codes will also be added for the treatment facility to expand the types of waste the plant can process through the same permitted treatment methods of neutralisation, redox and precipitation following existing approved management systems and operating techniques.

Environmental risk assessment

This minor technical variation will allow the facility to accept an enhanced range of waste materials to ensure the best treatment options are available for the current market. There will be no change to existing site processes or operations as a result of this variation and therefore it is not considered there will be any additional environmental risk from emissions (to air, water, land, fugitive), odour, or noise that cannot be controlled under existing permitted processes, engineered mitigation methods, operating techniques and management systems.

The Permit Conditions

The minor technical variation introduces the following amendments to Environmental Permit EPR/SP3531SK/V007.

- The addition of EWC codes to Table S3.2, *Permitted waste types and quantities for Transfer Facility*. Existing Table S3.2 has been deleted and replaced with amended Table S3.2.
- The addition of EWC codes to Table S3.3, *Permitted waste types and quantities for Treatment Plant* (maximum quantity 5407 tonnes). Existing Table S3.3 has been deleted and replaced with amended Table S3.3.
- The addition of EWC codes to Table S3.4, *Permitted waste types and quantities for Treatment Plant* (maximum quantity 986 tonnes). Existing Table S3.4 has been deleted and replaced with amended Table S3.4.
- The addition of EWC codes to Table S3.5, *Permitted non-hazardous waste types and quantities for Storage and Treatment*. Existing Table S3.5 has been deleted and replaced with amended Table S3.5.
- The site plan in Schedule 2 of the permit has been deleted and replaced by an amended site plan. Condition 2.2.1 of the permit has been amended to reflect the updated site plan in-line with our current guidance.

We are satisfied the additional waste acceptance types introduced by this minor technical variation will not increase the overall environmental risk of the Installation and that any potential environmental risks can be controlled under existing permitted processes, management arrangements and engineered mitigation methods.

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

Environmental Management Systems (EMS)

We are satisfied the operator has adequate EMS arrangements in place to adequately mitigate and manage potential environmental risks from permitted operations. This decision was taken in accordance with RGN 5 on Operator Competence.

The Gwent Waste Management Centre site operated by Tradebe Gwent Limited is accredited with the following management systems (at the time of permit issue).

- ISO 9001:2015 Quality Management.
- ISO 14001:2015 Environmental Management.
- OHSAS 18001:2007 Occupational Health & Safety.

OPRA

The OPRA score at permit issue is 216.