

Compliance Assessment Report

Report ID:
CAR_NRW0035544

This form will report compliance with your permit as determined by an NRW officer

Site	Gwent Waste Management Centre NRW/EPR/SP3531SK/V007	Permit Ref	SP3531SK		
Operator/Permit holder	Tradebe Gwent Limited				
Regime	Installations				
Date of assessment	31/07/2019	Time in	10:00	Out	13:00
Assessment type	Report/Data Review				
Parts of the permit assessed	Routine submissions and audit actions				
Lead officer's name	Kemp, Andi				
Accompanied by					
Recipient's name/position	Tim Park/ Site Manager	Date issued	07/08/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Tradebe (SP3531SK) Gwent Waste Management Centre, Newport: Meeting & Inspection – 13th February and 31st July 2019

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Purpose of Compliance Assessment

In response to the Pre-acceptance, acceptance and treatment audit, a number of responses were received off the operator, these are assessed below. A number of improvements have been implemented at the site – these were inspected on 31st July 2019. Discussion took place about a number of initiatives the operator is planning. A brief discussion took place about the ongoing IED review and the recent permit variation. Cadmium emissions to sewer, a trans frontier shipment of waste and incorrect labelling issue were discussed. Lastly routine monitoring and other submissions are assessed.

Pre-acceptance, Acceptance and Treatment Audit Actions

The above audit was carried out over a number of inspections and a site meeting to discuss the draft audit report took place on 13th Feb. 2019 – the final audit was then formally issued on the 14th Feb. 2019. On the 22nd Feb. 2019 the operator submitted a response to actions, recommendations and observations and included reviewed documents.

Action 1 January 2019 – Cyanide is a mandatory test, except for acidic wastes, where the cyanide ion would not be present – under acidic conditions the cyanide would volatilise off as hydrogen cyanide gas and therefore not be present in acidic waste arriving at the site. The waste analysis matrix FGLA 006 has been amended to differentiate between acidic and alkaline wastes. **Action closed.**

Action 2 January 2019 – The relevant section of PGRH 101 Acceptance of Containerised Waste has been revised to make it clear that the same testing, as on the analysis matrix FGLA 006, is carried out. **Action closed.**

Action 3 January 2019 – The operator confirms that the gas cylinders are stored in a separate cage, in an upright position and protected from sunlight. **Action closed.**

Action 4 January 2019 – Part of this is included in the site improvements seen in July 2019. This concerned adequacy of the quarantine and waste rejection area. **Action closed.**

Action 5 January 2019 – The operator has confirmed and submitted the relevant document, that guides customers on what not to pack in lab smalls waste packages and how to pack such wastes. **Action closed.**

Action 6 January 2019 – This action concerned the rising temperature threshold when mixing bulk wastes. The operator asserts that the tanks are rated to 50 deg C, therefore 45 deg C is seen as the upper limit indicating that wastes are incompatible. There were other comments made by NRW relating to bulk tank temperature monitoring and the operator is carrying out HAZID studies to determine if the risk is large enough to warrant temperature probes on the treatment tanks. **Action closed.**

Action 7 January 2019 – The operators response is copied below in italics:

Cadmium and Mercury are checked in all samples at pre-acceptance and retrospective analysis that is completed. Due to the issues raised by Welsh Water we are currently routing all cadmium and mercury streams away from the treatment plant.

PCBs are highlighted at pre-acceptance using Material Assessment Questionnaire (MAQ) forms, information from customers, and awareness of types of industry. PCBs are looked for using copper wire test, test kits and sending samples through to Celtic Recycling. Tradebe have acquired a GC for the lab and are investigating setting it up for PCB checks.

*POPs are highlighted at pre-acceptance using Material Assessment Questionnaire (MAQ) forms, information from customers, and awareness of types of industry. We use external laboratories to verify samples where needed and are also looking into the feasibility of analysing for them using the GC. **Action closed.***

A number of observations were made in the audit and the operator has responded to these:

- The operator has revised some of their procedures to make the purpose and scope of the relevant documents clearer.
- Ecotoxicity is considered within the COMAH screening thresholds.
- Samples are analysed immediately and if relevant are refrigerated awaiting collection. Customers

are advised what containers to use when supplying samples.

A number of recommendations were made and the operator provided responses:

- Ongoing review of BAT is being made against the current waste treatment BRef, within the IED review.
- The lab procedures make it clear what bottles and other aspects of sampling need to be carried out to ensure representative samples are obtained.
- PGRH 103 Sampling of Waste Material procedure has been amended to clarify the competence required, i.e. Technically Competent person or site chemist.

Inspection 31st July 2019

The main purpose of this inspection was to verify several improvements made at the site. Firstly, the main reception area has been refined – this is two hatched areas for waste imports to be unloaded. From here verified wastes either go into the transfer station, to the treatment process queues or to the quarantine / rejection area. Waste is not held here for any longer than sample confirmation takes. The quarantine / rejection area has been laid out following HSG71, with signs indicating what should be stored in what row to avoid compatibility issues. There are gaps between each row and on the day of the inspection, there was limited waste in this area – while queries are made with the waste producer.

The next improvement is a newly concreted area opposite the transfer station. The purpose of this is for waste that has been accepted and bulked up in the transfer station and is ready for onward transfer, to be removed from the transfer station on the day of transfer out. Here it awaits the transport off the site. This makes management of the transfer station bays more efficient and less crowded, enabling easier stock movement. The outside concrete area drains to the treatment plant sump, which is periodically pumped to sewer. In an email exchange between the operator and NRW, a revised plan was submitted and AK reminded Tradebe about key guidance for pollution prevention infrastructure: CIRIA C736.

The oxidising wastes have been removed from the transfer station and now reside at the rear of the treatment building, in a sealed and banded, lockable steel container – with suitable marking. The operator asserts that this waste location is routinely checked by staff and appears on CCTV. Attached to this report within NRW files is a new site and transfer station layout, MOC form and the specification of the oxidiser container.

Within the transfer station itself, the operator is currently reordering some of the bays – space gained from removal of oxidising wastes – and aligning more closely to HSG71 segregation best practice. The transfer station was already set out to adhere to this guidance broadly, but the operator has taken this

opportunity to refine the layout and reduce risk even further with regard to separation of flammable liquids and flammable solids.

These improvements have been included on amended site plans.

A number of other HSE driven improvements have also been made: tankers now drain via hose into the reception pits; additional guarding over the sludge conveyor screw.

Previously discussion have taken place about replacing some of the concrete flooring in the treatment building, to ensure it is resistant to spilled substances, drains preferentially and protects the ground below the site.

Operator Initiatives and Projects

A number of trials and projects are taking place or otherwise being planned: reduction of metals (especially molybdenum) and sulphate to sewer; paint treatment; air pollution control residues treatment.

On the 16th May 2019 the operator sent an email enquiring about treatment of paint residues, the objective being to reduce waste to landfill. The site plans to treat the paint wastes in isolation to keep the filter cake separate. The waste codes are within the permit and the normal treatment process will be utilised – i.e. precipitation. The operator must ensure they are not deviating from the operating techniques within the permit without the necessary variation. If the existing processes are used, this should not constitute a variation. The outgoing waste once treated would require coding under Chapter 19 of the EWC.

On 4th June 2019 the operator indicated that within the recent permit variation (discussed separately below) the site would accept and treat air pollution control residues – they want to do this in a dedicated tank, not currently included in Table S1.1 of the permit. NRW are content to authorise this. These waste could reduce raw materials used in acidic waste treatment. It has been previously discussed that this table is too restrictive by naming specific tanks for a specific processes. The IED permit review will seek to update this table and ensure only authorised treatment processes take place, without restricting the site to specific tanks.

After performing lab trials on molybdenum and sulphate removal, from discussions with Welsh Water to improve the quality of the discharge to sewer, the site has now installed a pilot plant and employed a chemical engineer to carry out the trials. The laboratory manager, Monica Huerta supplied a presentation on the objectives and process of the trials. On the 5th June 2019 the operator submitted a management of change and risk assessment covering the pilot plant aspect of these trials. Part of this work is driven by the indirect emission limits in the new waste treatment BRef. On 6th June 2019, AK (NRW) responded to the operators initial email recommending a number of points. NRW is happy to support this pilot plant trial. The set up was examined during the 31st July inspection. NRW look forward to receiving data from the

trials. There may be additional regulatory work to do on this matter – AK has filed the MOC, risk assessment, presentation and emails about this subject.

IED Review and Recent Permit Variation

The operator has recently successfully applied for a variation to add a number of EWCs codes, such as air pollution control residues. AK has checked the draft variation and decision document – there are no comments to make except for the use of codes ending '99. This was discussed on 31st July 2019 and the operator assures NRW that the use of '99 codes will be the exception and only used as outlined in the guidance.

In terms of the ongoing IED review, the r61 notice has been issued and the operator is to reply to the requirements in the notice by 30th September 2019. The operator is making progress and to provide guidance, AK suggested a meeting at the site on 15th August 2019 to ensure the operator is on track and able to demonstrate compliance with relevant BAT and AELs.

Some things, mentioned in this CAR1 form elsewhere, but nonetheless need to be addressed at the time of the IED review (possibly at additional cost) are:

- Cadmium and other priority hazardous substances to be considered in discharges
- Decrease in pH for secondary acid scrubber: from equal to or greater than 10 to 8.5 – 9.5.
- Confirmation of all treatment processes, including APC residues, neutralisation, precipitation, oil and cyanide treatment, metal and sulphate reduction processes
- The basis and requirements for sewer emissions monitoring – continuous not batch

Potential Ongoing Issues

Previously emissions of cadmium have been discussed. Initially this was raised by DCWW as this substance is not on the trade effluent consent for the sites emission to sewer. Tradebe approached NRW and DCWW also indicated that NRW should put this substance in the permit. Tradebes permit includes Table S4.3 for releases to sewer, but with no limits and cadmium is not in that table. Several emails were exchanged between Tradebe and NRW. Essentially DCWW have to take their own course of action if they are not satisfied with the trade effluent consent. NRW will be addressing emissions to sewer, especially priority

hazardous substances, which cadmium and its compounds are classified as – Directive 2013/39/EU Annex I, which amends the original priority substances and priority hazardous substances of the Water Framework Directive – 2000/60/EC, via the IED permit review. The IED review and r61 notice requires the site to risk assess releases of priority hazardous substances to sewer and surface water – this is where cadmium, amongst other substances, will be assessed.

Another potential issue was raised by another EPR site through NRW's Regulatory Officer for that site: The Royal Mint. Apparently Tradebe send labels to TRM for them to affix to the relevant wastes in preparation for Tradebe to pick up the waste. TRM claim (on more than one occasion) that the wrong labels had been sent by Tradebe. AK raised this on 31st July and Tradebe gave no indication they knew about such incidents. It was mentioned, that at this stage, whether TRM put correct labels on incorrect waste, or Tradebe sent incorrect labels, which the Mint had to use, is not known.

Action 1 Tradebe 31st July 2019: *Tradebe to investigate this and report back if and what has actually happened and what will be done to eradicate this in the future. Due: 30th Sept. 2019*

The last issue that needed raising was a trans frontier shipment of waste incident. The NRW department that oversees TFS alerted AK to a waste rejection from a site in Holland. Tradebe were the waste producer and a company called Totus acted as the notifier and arranged the waste to go to the Dutch site. There were two aspects to this: the Dutch site have decided to no longer accept these wastes (sharps from injecting solvents in lab work), but apparently did not tell the waste producer; secondly Tradebe admitted that in any event this waste drum should not have been put on the transport that day.

Action 2 Tradebe 31st July 2019: *Tradebe to submit a written response concerning what has actually happened and what will be done to eradicate this in the future. Due: 30th Sept. 2019*

Routine Submissions

The permit requires the following monitoring data:

- pH of scrubber liquors – 6 monthly
- sewer emission monitoring data – 3 months

The last batch of data assessed was up to Dec. 2016. The data and submissions assessed here include the above emissions and data from Jan. 2017 – Mar. 2019; site Closure Plan; 2017 annual performance indicators; annual performance report; and the same for 2018.

Quarterly emissions to sewer – All parameters for each quarter have been reported. There Are no ELVs,

but the site has a trade effluent consent with DCWW. As already mentioned the basis for monitoring (continuous, composite, batch, time or flow weighted) needs to be considered within the IED review along with any relevant missing parameters, e.g. cadmium. It is worth noting that currently the site data is typically marginally higher than the BAT AELs for indirect emissions – however the averaging basis needs to be considered when comparing site data with AELs.

6 Monthly scrubber pH – The required 6 monthly data sets of daily monitoring have been submitted. Note the change (to be addressed in the IED variation) of the secondary acidic scrubber pH being lowered. The primary scrubbers, SC2 and SC3 scrub acidic and alkaline fume from tank emissions and SC1 mops up any acidic carry over in a combined emission stack. There is some variation in the results submitted, but nothing to suggest environmental risk or poor operation. There may well be a future regulatory topic to examine in more detail the performance of the scrubbing units and composition of released gaseous emissions.

Site closure plan – Permit condition 2.7.3 requires reviewing the closure plan every 4 years. Assessed here is a Jan. 2018 review: Gwent Site Closure Plan PGEN104 issue 1. The plan is comprehensive enough to deal with the processes on site. The main issue being tank emptying and washing, line washing and sump emptying. Bear in mind that a surrender site condition report, showing no deterioration to the ground and groundwater beneath the site, will be required. Therefore samples are likely needed from boreholes and soil testing. These installations need to be protected during decommissioning and any demolition and the surrender data should not be taken until all these activities are completed. Operators should document all actions and follow internal procedures. Be mindful of contractors on site and mobile equipment and associated fuel / oils. Review accepted.

Annual performance data – The relevant submissions for 2017 and 2018 have been made. Condition 4.2.1 requires a review of monitoring data, annual improvement targets and performance data as stipulated on the relevant permit forms. The narrative covering 2017 data and performance is a useful piece of information and the regulator can see and assess various performance and improvements. Waste imports vary, so performance data like tonnage of filter cake, volume discharged, amount to landfill etc. don't necessarily provide any trend information. Energy consumption, and in particular natural gas, is somewhat higher in 2018 than 2017.

Action 3 Tradebe 31st July 2019: *Tradebe to submit an explanation for increased energy use for the year 2018 . Due: 30th Sept. 2019*

Other things to note in the 2018 submission are the current trials (mentioned earlier) with regard to reducing metals in effluent – a DCWW and IED driver, also staff and management structure changes including senior management. The site should be commended for the various improvements already implemented and the effluent trials being conducted.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035544**

This form will report compliance with your permit as determined by an NRW officer

Site	Gwent Waste Management Centre NRW/EPR/SP3531SK/V007	Permit Ref	SP3531SK
Operator/Permit holder	Tradebe Gwent Limited	Date	31/07/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.