

Compliance Assessment Report CAR_NRW0044532

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: Site Inspection,

Reason: Routine.

On: 11/06/2024 between 10:00 and 15:15.

Parts of permit assessed: Site visit; 3.1.2 BAT AELs compliance; ICs completed; Site update.

NRW Lead Officer: Rebecca Green.

Report sent to: Alex Morris, Site Manager, on 13/06/2024.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| IR3A - Installations - Emissions and monitoring - Emissions to water, air or land | Action only (X) | |
| IR3A - Installations - Emissions and monitoring - Emissions to water, air or land | Action only (X) | |
| IR3E - Installations - Emissions and monitoring - Monitoring | Action only (X) | |
| IR4B - Installations - Information - Reporting | Assessed (A) | |
| IR2A - Installations - Operations - Permitted activities | 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 |
|----------|--|-------------|
| IR3A | Investigate causes of high AOX concentrations in final effluent. Report findings to NRW by due date. | 01/11/2024 |
| IR3A | Report results of air emissions monitoring to NRW as soon as they are received. | 31/07/2024 |
| IR3E | Re-join laboratory validation scheme. | 31/07/2024 |

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

The purpose of this inspection was to update Natural Resources Wales (NRW) on Tradebe's present activities and future developments prior to Rebecca Green's retirement and to set emission limits that comply with the BAT AELs set in Schedule 3 (b), Table S3.3.

RVG explained future arrangements for regulation of the site. Tradebe will not, at present, have a designated site officer. They have received an email detailing future arrangements and should continue to send all monitoring data to Liz Parr.

BAT AELs Compliance

Operators were required to comply with the BAT AELs derived from the Waste Treatment BAT Conclusions by 17th August 2022. Tradebe had claimed that their business in Wales would be uncompetitive because similar operations in England were not required to comply until December 2024. NRW have allowed Tradebe considerable time to improve their operations so that the discharges to sewer would be compliant and now feel that the BAT AELs must come into effect.

This will apply from July 2024 and the S1 Reporting Form for Q3 2024, due to be submitted by 30th October 2024, must contain all the information required in Schedule 3 (b), Table 3.3. Any breaches of the emission limit values (ELV) in Q3 may not be scored, at NRW's discretion.

Tradebe are confident that the necessary improvements to the treatment plant will be operational by 1st December 2024.

The agreed ELVs and monitoring frequencies are given in the table below.

AOX: This has been found to be high in some releases and Tradebe are investigating the possible causes. **See Action IR3A above.**

Due to the nature of the matrix of Tradebe's final effluent discharge and known interferences with the analysis method, NRW have agreed an action limit of 5mg/L before Tradebe must submit a Schedule 5 Notification.

BTEX: Tradebe have suitable analytical equipment in-house.

HOI: Tradebe do not have suitable in-house analytical equipment but intend to purchase some. The monitoring frequencies will change once this equipment is in use.

Free cyanide: External analysis results are likely to be inaccurate due to the time taken to get to the laboratory. NRW have reasonable confidence that Tradebe's internal results will be sufficient.

Total chromium (Cr) and hexavalent chromium: External laboratory results for hexavalent Cr have been variable. Tradebe have developed a procedure whereby they only analyse for hexavalent Cr if the internal result is greater than or equal to 0.09mg/L. NRW agree that this procedure is suitable and sufficient.

Mercury: Tradebe's internal analysis method has a limit of detection of 20µg/L but the ELV is 10µg/L. External analysis results are consistently much lower than the ELV and so, in NRW's opinion, quarterly external analysis of a composite sample is sufficient.

Nickel and Zinc: These parameters may breach the ELV until the improvements to the treatment plant have been fully installed. NRW will consider their enforcement response on a case-by-case basis. Tradebe should submit a Schedule 5 Notification for any breaches of the ELV.

| Parameter | Sampling | Analysis | ELV |
|---|---|---|--|
| AOX | Each batch into composite | External, monthly | 1mg/L, action limit 5mg/L |
| BTEX | Each batch into composite | Internal monthly. External quarterly | None set |
| HOI | Each batch into composite | External, monthly until able to analyse in-house. Then weekly internal and quarterly external | 10mg/L |
| Free cyanide | Each batch | Daily, internal. | 0.1mg/L |
| As, Cd, total Cr, Cu, Ni, Pb, Zn, Mn Cr ⁶⁺ | Each batch and into composite for external analysis | Daily, internal. External, quarterly | 0.1mg/L 0.1mg/L 0.3mg/L 0.5mg/L 1mg/L 0.3mg/L 2mg/L none 0.1mg/L |
| Hg | Each batch into composite | Quarterly, external | 10µg/L |
| PFOA | Each batch into composite | 6 monthly, external | none |
| PFOS | Each batch into composite | 6 monthly, external | none |

Tradebe should re-join the laboratory validation scheme that they used to be in so that their internal analysis results can be verified. This will improve any future OMA scores and may influence the need for analysis by external laboratories. **See Action IR3E above.**

Monitoring of emissions to air

Unforeseen structural problems with the building have caused delays in the erection of the gantry. This has now been completed but the monitoring ports have yet to be installed. This is due week commencing 17th June 2024. Monitoring will be completed soon after that. Tradebe should submit the results as soon as they receive them. **See Action IR3A (2) above.**

Improvement Conditions

IC14: The monitoring methodology has been received and accepted.

IC14 has been completed and can therefore be closed.

IC15: The monitoring methodology has been agreed.

IC15 has been completed and can therefore be closed.

IC16: A Phase 1 screening report was submitted some time ago. The report was accepted.

IC16 has been completed and can therefore be closed.

Improvements to treatment plant

Trials have progressed from laboratory scale to pilot plant and were successful. They are due to be installed on the treatment plant by 1st December 2024.

High zinc levels in filtercake

These are the result of the treatment of acids from galvanising processes. Should their current classification prove to be incorrect, Tradebe have determined that incoming acids must contain less than 4g/L zinc if the resulting filtercake is to maintain its classification as non-hazardous. These acids are a useful commodity for Tradebe and the inability to use them in the treatment process would mean that "clean" acids would have to be purchased, defeating the object of the circular economy and the re-use of wastes. There are also supply problems with "clean" acids.

The zinc content of the filtercake can, to some extent, be controlled by controlling the inputs to the treatment plant.

Classification of the filtercake as hazardous would mean that there is no viable disposal route as they fail the relevant WAC test due to high chloride levels. NRW's hazardous waste team are still considering their position on these wastes.

Replacement of lime with air pollution control residues (APCr)

This is a viable project and, once Tradebe have identified suitable sources, construction will start on the necessary storage silos and mixing plant. This will probably happen in 2025.

Some sources have high zinc levels but Tradebe have identified which APCr waste is likely to contain lower levels of zinc.

Use of APCr as a cement block filler was felt to be uneconomic because it has to be dried after treatment.

Use of waste as a fuel

This project is continuing and if successful, construction of the required plant should begin at the end of Q3 2025. Alternative uses of this waste are also being sought.

Site Inspection

A brief site inspection showed that the areas were clean and tidy, with no evidence of spillages. The waste transfer station was particularly well organised and clean. The gantry erected to allow air emissions to be monitored was seen. The proposed sites for the APCr equipment and that for the use of waste as a fuel plant were also seen.

Tradebe are continually investigating new ways of using waste and widening their business and NRW welcome this innovative approach and will support them wherever possible.

NRW appreciate the open and co-operative relationship that has been developed with Tradebe and hope that this will continue into the future.

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.