

Compliance Assessment Report CAR_NRW0044643

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: 07/05/2024 - 02/07/2024.

Parts of permit assessed: Monitoring Returns.

NRW Lead Officer: Geraint Harris.

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

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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
IR3B	Tradebe to provide an update on the works identified in the pipeline inspection report at the next compliance meeting	28/11/2024

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

Tradebe (Bridgend) Ltd

EPR/NP3233XX

Quarter 1 Sewer Monitoring Returns

Operators were required to comply with the BAT AELs derived from the Waste Treatment BAT Conclusions by the 17th of August 2022. Tradebe had claimed that their business in Wales would be uncompetitive because similar operations in England were not required to comply until September 2024. 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 monitoring returns for Q1 have been reviewed and are within the current permitted limits.

Previous Car Form (CAR NRW0043531)

Measurement Uncertainty

CAR_NRW0043531 Action1: Please review the uncertainty calculations and values for AOX, Lead, Copper and Chromium. **Due 18th April 2024.**

Action 1 in the previous car form has not been responded to. 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. Tradebe are to be reminded that without a credible uncertainty value any reported ELV exceedances, even if they are just over the limit, will be considered a breach of the permit.

Previous Car Form (CAR NRW0044516)

Tradebe was asked when the last time the underground pipes, channels and associated gullies were inspected and to provide the results of this inspection. In response Tradebe provided the CCTV footage of the inspection they completed in September 2023. This inspection involved the use of CCTV techniques to inspect the underground effluent discharge pipeline which connects to the sewer discharge point. Tradebe reported that no defects were found.

Action 7 from the audit report: Please send a copy of the CCTV inspection report to NRW by the 10th of July 2024.

The re-port was received on the 12/06/2024 and identified the need for further works.

Action: Tradebe to provide an update at the next compliance meeting.

Waste Returns for 2024:

Q1 waste returns have been reviewed and are satisfactory.

Improvement Condition 6

The Operator shall complete and submit for approval a Phase 1 screening test report for priority hazardous pollutants and any other relevant priority hazardous substances discharged to sewer. For any substance which is not screened out by the screening tests, further modelling (as described in the risk assessment guidance "Surface water pollution risk assessment for your environmental permit") should be undertaken, and the results of the modelling submitted to Natural Resources Wales for approval.

Due to the effects of analysing a 'dirty' matrix (effluent) on the limit of detection, it has not been possible to undertake a true assessment of some of the priority hazardous substances required by this improvement condition. This is currently with the monitoring network within NRW and will be discussed in a later CAR Form.

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.