

Compliance Assessment Report CAR_NRW0049771

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: Check Monitoring/Sampling,

Reason: Routine.

On: 24/10/2025.

Parts of permit assessed: Emissions monitoring and reporting.

NRW Lead Officer: David Thomson.

Report sent to: Redacted, Site Manager, on 24/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C4 No impact	4.3.1(b)(i)

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

Total non-compliances recorded	Total non-compliance score
3	8.1

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(1)	Undertake measures to prevent the reoccurrence of a HOI exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.	28/11/2025
IR3A(1)	Undertake measures to prevent the reoccurrence of an AOX exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.	31/12/2025
IR4C	NRW shall be notified of all future permitted limit exceedances within 24 hours of detection	Already completed

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter *NRW*) assessment against **Tradebe Gwent Limited's (hereafter Tradebe or operator) 6-monthly [January to June 2025]** reporting, emissions & monitoring and notification requirements as specified in their environmental permit.

1.0 Reporting

Condition **4.2.3** of the environmental permit states:

Within 28 days of the end of the reporting period 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, as follows:

- (a) in respect of the parameters and emission points specified in **schedule 4(b) table S4.1**;*
- (b) for the reporting periods specified in **schedule 4(b) table S4.1** and using the forms specified in **schedule 4(b) table S4.4**; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4(b) to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air parameters as required by condition 3.5.1	A1, A2, A3	Every 6 months	1 January

Emissions to sewer parameters as required by condition 3.5.1	S1	Every 6 months	1 January
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Note – Document CAR_NRW0044532 specifies reduced monitoring requirements for emissions to sewer compared to those stated in schedule 4(b) table S4.1 (e.g., reduced monitoring frequencies for AOX, HOI and Hg).

Table S4.4 of Schedule 4(b) to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022
Air	Form Air 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022

Reporting Compliance Assessment

Point Source Emissions to Air (A1, A2 & A3)

1. The monitoring report for emissions to air was submitted via email on 19 May 2025.
2. The monitoring report submission was made inside the reporting window which represents compliance with the environmental permit.
3. The monitoring report submitted did not include all parameters and emission points specified in schedule 4(b) table S4.1 which represents non-compliance with the environmental permit. **Note** – NRW have identified that the air1 form issued to Tradebe **did not** include the reporting of ammonia as required by schedule 4(b) table 4.1. Upon request to the operator this data was submitted to NRW without delay so no non-compliance score will be levied. NRW will issue an updated air1 form to Tradebe prior to the end of the current reporting period.
4. The monitoring report submitted is for the reporting period specified in schedule 4(b) table S4.1 which represents compliance with the environmental permit.
5. The monitoring data has been submitted using the form specified in schedule 4(b) table 4.4 which represents compliance with the environmental permit.
6. The monitoring report submitted includes results and assessments as required by the air1 form specified in schedule 4(b) table 4.4 which represents compliance with the environmental permit.

Note – As stated above, reporting form air1 did not include all of the emissions and monitoring parameters stated in schedule 4(b) table 4.1 (i.e., reporting of ammonia). NRW will provide an updated reporting form to Tradebe before the end of the current reporting period.

Point Source Emissions to Sewer (S1)

1. The monitoring report for emissions to sewer was submitted via email on 23 April 2025 & 15 July 2025. **Note** – the reporting frequency stated in schedule 4(b) table S4.1 for emissions to sewer is every 6 months, so the submission of quarterly monitoring data by Tradebe is not necessary.
2. The monitoring report submission was made inside the reporting window which represents compliance with the environmental permit.
3. The monitoring report submitted includes all parameters and emission points specified in schedule 4(b) table S4.1 which represents compliance with the environmental permit.
4. The monitoring report submitted is for the reporting period specified in schedule 4(b) table S4.1 which represents compliance with the environmental permit.
5. The monitoring data has been submitted using the form specified in schedule 4(b) table 4.4 which represents compliance with the environmental permit.
6. The monitoring report submitted includes results and assessments as required by the sewer1 form

referenced in schedule 4(b) table 4.4 which represents compliance with the environmental permit.

Note – as previously stated, Document CAR_NRW0044532 specifies reduced monitoring frequency requirements for AOX, HOI and HG when compared to those in schedule 4(b) table S4.1. Form sewer1 has been updated to reflect these changes.

2.0 Emissions and Monitoring

Condition 3.1.2 of the environmental permit states:

The limits given in schedule 3 shall not be exceeded.

Table S3.3 of Schedule 3(b) to the environmental permit is partially reproduced below.

Table S3.3 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency ^{1,2}	Monitoring standard or method
S1	Adsorbable Organically Bound Halogens (AOX)	Treatment plant within process building	1mg/l	None set	Once every day	EN ISO 9562
S1	Hydrocarbon Oil Index (HOI)	Treatment plant within process building	10mg/l	None set	Once every day	EN ISO 9377-2

¹ In the case of batch discharge less frequent than the minimum monitoring frequency, monitoring is carried out once per batch.

² In the case of an indirect discharge to a receiving water body, the monitoring frequency may be reduced if the downstream waste water treatment plant abates the pollutants identified.

Note – Compliance Assessment Report CAR_NRW0044532 specifies lower monitoring frequency requirements for AOX and HOI emissions to sewer compared to those stated in schedule 3(b) table S3.3 (i.e., monthly instead of once every day). CAR_NRW0044532 also states that a schedule 5 notification does not have to be submitted for AOX until 5mg/l is exceeded.

Point Source Emissions to Air (A1, A2 and A3)

The were no limited exceedances reported for point source emissions to air during January to June 2025.

Point Source Emissions to Sewer (S1)

Limit Exceedance – HOI

Emissions monitoring data submitted on 23 April 2025 demonstrates that the measured HOI result at S1 on **13 January 2025 @ 11:30** was **22.8mg/l**. This is an exceedance of permitted emission limit and represents non-compliance with the environmental permit.

As a result of this non-compliance a CCS Score [C3] has been recorded against compliance sub-criteria IR3A Emissions – Water, Air and Land.

Action 1: Undertake measures to prevent the reoccurrence of a HOI exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.

Limit Exceedance – AOX (1)

Emissions monitoring data submitted on 15 July 2025 demonstrates that the measured AOX result at S1 on **13 April 2025 @ 09:30** was **8.43mg/l**. This is an exceedance of permitted emission limit and represents non-compliance with the environmental permit.

Limit Exceedance – AOX (2)

Emissions monitoring data submitted on 16 September 2025 demonstrates that the measured AOX result at S1 on **10 June 2025 @ 09:30** was **7.95mg/l**. This is an exceedance of permitted emission limit and represents non-compliance with the environmental permit.

As a result of this non-compliance a consolidated CCS Score [C3] has been recorded against compliance sub-criteria IR3A Emissions – Water, Air and Land.

Action 2: Undertake measures to prevent the reoccurrence of an AOX exceedance and/or measures to rectify, limit or prevent any pollution of the environment, as identified by the investigation and presented in the Part B Notification.

3.0 Notifications

Condition 4.3.1 (b)(i) of the environmental permit states:

(b) in the event of a breach of any permit condition the operator must immediately
(i) inform Natural Resources Wales

Condition 4.3.2 of the environmental permit states:

Any information provided under condition 4.3.1(a)(i) or 4.3.1(b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

Note – Schedule 5 Part A(b) of the environmental permit requires NRW be notified within 24 hours of detection of an exceedance of permitted limits.

Point Source Emissions to Sewer (S1)

Limit Exceedance – HOI

The operator notified NRW of an exceedance of the HOI permitted emission limit on 14 October 2025 @ 17:15. This exceedance was detected on 13 January 2025 @ 11:30. The operator failed to notify NRW within 24 hours of detection which represents non-compliance with the environmental permit.

Limit Exceedance – AOX (1)

The operator notified NRW of an exceedance of the AOX permitted emission limit on 16 September 2025 @ 13:57. This exceedance was detected on 13 April 2025 @ 09:30. The operator failed to notify NRW within 24 hours of detection which represents non-compliance with the environmental permit.

Limit Exceedance – AOX (2)

The operator notified NRW of an exceedance of AOX permitted emission limit on 16 September 2025 @ 13:57. This exceedance was detected on 10 June 2025 @ 09:30. The operator failed to notify NRW within 24 hours of detection which represents non-compliance with the environmental permit.

As a result of this non-compliance a consolidated CCS Score [C4] has been recorded against compliance sub-criteria IR4C - Notification.

Action 3: NRW shall be notified of all future permitted limit exceedances within 24 hours of detection

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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.