Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0052930

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: 22/07/2026 - 11/09/2026.

Parts of permit assessed: 1.1.1(a) and and 1.1.2 and and 3.1.2 and 3.2.3 and 3.5.2 and 4.1.1 and 4.1.2 and 4.2.3 and 4.3.1(b).

NRW Lead Officer: Geraint Harris.

Report sent to: Site Manager, Site Manager, on 14/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)
IR4C - Installations - Information - Notification	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR2C - Installations - Operations - Operating techniques	C3 Minor	3.2.3
IR1A - Installations - Management - General Management	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Ongoing (O)	3.1.2
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR2C - Installations - Operations - Operating techniques	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR4B - Installations - Information - Reporting	Assessed (A)	

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR1A	Update Tradebe's procedure governing environmental reporting (PBEN 102) to clearly define responsibilities for completing Schedule 5 notifications, regulatory returns, and implementation of the site's proposed '4 eyes' review process. This is as recommended by the external EMS audit.	Already completed
IR4C	Ensure Tradebe complete and submit Schedule 5 notifications in accordance with permit condition 4.3.1(b).	Already completed
IR1A	Action 1: Review arrangements for the retention, control and retrieval of competency and training records and provide NRW with a summary of the improvements implemented to demonstrate compliance with permit conditions 1.1.1(b) and 1.1.2. Action response due 9th October 2026.	09/10/2026
IR2C	Action 2: Provide NRW with: 1. Details of the repairs undertaken or proposed to restore the integrity of the bund. 2. Evidence demonstrating that all liquid wastes and chemicals currently stored on site are provided with compliant secondary containment arrangements. 3. Confirmation that a review of liquid storage and containment arrangements has been completed across the site to prevent recurrence	09/10/2026
IR1A	Action 3: Provide NRW with: 1. Provide details of the scope and requirements of the annual internal environmental compliance audits and process flow audits, together with an explanation of why these audits were not undertaken during 2025 and 2026 and how this was allowed to occur within the site's management system. 2. Confirmation of whether inspections of secondary	09/10/2026

Criteria	Action needed	Complete by
	containment infrastructure are included within the scope of the site's annual environmental compliance audits and/or process flow audits. 3. Copies of the audit schedules, inspection procedures or other documented arrangements used to inspect and maintain containment infrastructure. 4. An explanation of how the deterioration of the bund occurred without being identified through existing management system controls. 5. Details of the corrective actions implemented to ensure deterioration of containment infrastructure is identified and addressed at an earlier stage.	
IR3A(1)	Action 4: respond to actions 3 and 6. Action response due 9th October 2026.	30/10/2026
IR3E	Action 5: Tradebe must confirm whether all monitoring required by Table S3.3 of Permit EPR/NP3233XX was undertaken during May and June 2026 and provide copies of the relevant monitoring records.	09/10/2026
IR2C	Action 6: Provide NRW with: 1. The reason for removal of the carbon filter abatement system. 2. The date on which the system was removed and brought out of service. 3. Confirmation as to whether NRW was notified of, consulted on, or approved the removal of the system, and copies of any relevant correspondence.	09/10/2026
IR3E	Action 7: Tradebe shall provide details of the sampling and preservation methodology used for mercury analysis, including: • Sample container type and material; • Sample preservation procedures, including acidification and target pH; • Sample storage conditions; • Maximum holding times between sampling and analysis; and • Confirmation that the methodology complies with the relevant accredited analytical standard.	09/10/2026
IR3A(2)	Action 8: Confirm whether the sample collected on 11/06/2026 was obtained from a flow-proportional composite sample or a representative spot sample from a well-mixed and homogeneous effluent stream.	09/10/2026
IR3E	Action 9: The monitoring return references GIC-FID analysis for HOI, please confirm that the analytical method used	09/10/2026

Criteria	Action needed	Complete by
	complies with the requirements of EN ISO 9377-2.	
IR3A(2)	Satisfy the requirements of the Regulation 36 Notice requiring Tradebe to bring AOX emissions back into compliance.	09/10/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 - NP3233XX

Compliance Assessment Report CAR_NRW0050640 and CAR_NRW0051940 Action 1 follow up.

NRW has reviewed Tradebe's response to Action 1, including the implementation of the new corporate Engineering Change Management Procedure (TUK109) and the associated MaintMaster workflow. NRW welcomes the progress made and notes that the revised arrangements represent a significant improvement over the previous engineering change process. In particular, the procedure now includes formal change requests, documented risk assessment, consideration of environmental and regulatory impacts, mandatory SHEQ review, defined approval stages, implementation controls, handover requirements and auditable records within a centralised management system. The introduction of these controls demonstrates a more structured and systematic approach to managing change and reducing the potential for unmanaged risks.

NRW also notes positively that the procedure recognises environmental and regulatory considerations within the risk assessment process and provides greater traceability of decisions through the MaintMaster system. The inclusion of defined responsibilities, approval gates, risk assessment requirements and post-implementation reviews should support improved governance of engineering and operational modifications across the site.

However, the original non-compliance arose from a change to monitoring arrangements and permit compliance controls rather than a physical engineering modification. NRW notes Tradebe's statement that further revisions are being considered to incorporate procedural changes within both the procedure and MaintMaster workflow. At present, it is not yet clear how changes to monitoring methods, sampling plans, analytical arrangements, permit compliance activities, reporting processes or

regulatory notification arrangements would be consistently identified, assessed and approved through the revised system.

NRW therefore considers that the matter would benefit from further discussion at the next compliance meeting. This will provide an opportunity for Tradebe to demonstrate how the revised arrangements operate in practice and explain how compliance-critical and permit-related changes will be managed, including how the system will prevent a recurrence of the circumstances that led to the original non-compliance.

On the basis of the improvements made to date and the ongoing work being undertaken by Tradebe to further develop the system, NRW does not consider that a further action is necessary at this stage. The adequacy and effectiveness of the revised arrangements will be reviewed through ongoing regulatory engagement and discussion at the next compliance meeting.

Compliance Assessment Report CAR_NRW0050640 and CAR_NRW0051940 Action 2 follow up.

NRW previously identified failures by Tradebe Bridgend to notify NRW of permit breaches and emission limit value exceedances in accordance with permit condition 4.3.1(b). During the assessment recorded in CAR_NRW0050640, NRW determined that these failures appeared to indicate a wider management system weakness and therefore required Tradebe to undertake a detailed review of its Environmental Management System, specifically in relation to regulatory notifications, incident management, non-conformance, monitoring and communication.

As part of this action, Tradebe commissioned an independent EMS audit. The audit has now been completed (21/04/26 (On-Site) & 10/06/26 (Remote)) and identified a formal nonconformity relating to the site's reporting and communication arrangements. The auditor concluded that the procedure governing environmental reporting (PBEN 102) was incomplete and did not clearly define responsibilities for completing Schedule 5 notifications, regulatory returns, or implementation of the site's proposed "4 eyes" review process. The audit recommended that the procedure be reviewed and updated.

NRW considers these findings significant because they directly relate to the issues identified in CAR_NRW0050640. At that time NRW found that multiple emission limit exceedances had not been identified, escalated or reported to NRW, and that the operator demonstrated an incomplete understanding of regulatory notification requirements. NRW's original assessment concluded that either an adequate notification procedure did not exist or, if it did exist, it was not effectively implemented.

The findings of the independent EMS audit now provide evidence that the site's written management system was deficient in this area. The absence of clearly defined responsibilities and governance arrangements for regulatory reporting created a foreseeable risk that permit breaches would not be identified, reviewed and notified to NRW as required. This demonstrates that the notification failures were not solely isolated human errors but were symptoms of a wider weakness within the Environmental Management System.

Permit condition 1.1.1(a) requires the operator to manage and operate the activity in accordance with

a written management system that identifies and minimises risks of pollution, including those arising from non-conformances and incidents. A management system that does not clearly define responsibilities for regulatory notifications and reporting cannot be relied upon to systematically identify compliance failures and ensure that appropriate regulatory action is taken. Consequently, NRW considers that the operator was not operating in accordance with an adequate written management system as required by permit condition 1.1.1(a).

In accordance with NRW's compliance framework, root cause breaches should be recorded where investigation identifies an underlying management system failure that contributed to the original non-compliance. The original breach of permit condition 4.3.1(b) was categorised as a Category 3 non-compliance and the management system weakness identified by the audit presents at least the same reasonably foreseeable environmental risk because it has the potential to result in future permit breaches and delays in regulatory intervention. **NRW therefore categorises this breach of permit condition 1.1.1(a) as Category 3 (Minor)**

Action 4 from NRW0051940 is closely linked to Action 2 and will therefore be discussed in the following section.

Compliance Assessment Report CAR_NRW0051940 Action 4 follow up.

Tradebe has provided further information regarding the proposed "four eyes" approach and supplied an updated version of their 'PBEN 102 Bridgend NRW reporting' document (10/06/2026). The procedure has been reviewed following the EMS Audit and now includes a formal requirement for all regulatory reports and submissions to undergo an independent review by a suitably qualified individual who was not involved in preparing the submission. The reviewer is required to verify completeness, accuracy, permit compliance, calculations, data transfers, reporting periods, units and distribution requirements before submission. Evidence of the review and approval is also required to be retained.

NRW notes that the revised procedure incorporates the four-eyes review directly into the site's reporting arrangements and therefore forms part of the Environmental Management System. The procedure also includes a defined workflow of preparation, self-check, independent review, resolution of comments, submission and archiving, providing a more structured and auditable reporting process than was previously described.

The approach addresses the reporting deficiencies identified in CAR_NRW0050640, where incorrect data was submitted to NRW and where monitoring exceedances were not identified or escalated through internal review processes. By requiring independent verification of data prior to submission, the revised process should reduce the likelihood of transcription errors, duplicate reporting, incorrect reporting periods and omissions.

NRW considers that the response adequately explains how the four-eyes approach will operate in practice and how it has been integrated into the EMS. Whilst no management system can completely eliminate the possibility of human error, the introduction of an independent review stage represents a reasonable and proportionate control measure that should help minimise the risk of future reporting failures and support compliance with permit reporting requirements.

EMS Audit Findings Review

Site Inspection Details

Following a review of the Bridgend EMS Audit 21-04 & 10-06-26, completed by Trent Management Systems on 21/04/2026 and 10/06/2026, NRW assessed the audit findings against the requirements of Tradebe's environmental permit EPR-NP3233XX. The audit itself identified four minor non-conformances and eight observations. Several findings may indicate actual or potential non-compliance with permit conditions and require further assessment and corrective action.

Management System and Competence Records

The EMS audit identified that not all training and competency records were readily available, including forklift truck training records. The permit requires the operator to manage and operate the activities using sufficient competent persons and maintain records demonstrating compliance with those arrangements. Failure to retain or readily retrieve competency records may indicate weaknesses within the management system.

Action 1: Review arrangements for the retention, control and retrieval of competency and training records and provide NRW with a summary of the improvements implemented to demonstrate compliance with permit conditions 1.1.1(b) and 1.1.2. **Action response due 9th October 2026.**

Secondary Containment

The EMS audit undertaken on 21/04/2026 and 10/06/2026 identified that the integrity of the site bund adjacent to Factory Lane had been compromised and would not have adequately contained a spill from 16 × 1,000-litre IBCs containing waste PMI caustic stored adjacent to the sump. The audit concluded that the bund did not provide suitable secondary containment for the materials being stored in this location. The audit also noted that the IBCs had subsequently been relocated away from the affected area.

Permit Condition 3.2.3 states:

"All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container."

Whilst Tradebe subsequently relocated the IBCs, the audit finding demonstrates that the secondary containment arrangements were not effective at the time of the audit. Forklift truck operations and large vehicle movements occur within the vicinity of the storage area, and no physical barriers were in place to protect the IBCs from vehicle strike. This presents a reasonably foreseeable mechanism for potential loss of containment.

In the event of damage to an IBC, any leaked material could have escaped the compromised bunded area. Although it is unlikely that the full inventory of approximately 16,000 litres would be released during a single incident, the foreseeable failure of an individual IBC could have resulted in the escape of caustic material beyond the secondary containment system.

Based on the EMS audit report, it appears that no alternative measures were in place to prevent, or

where not practicable minimise, leakage and spillage from the primary containers, as required by Permit Condition 3.2.3. NRW therefore considers that the operator failed to provide effective secondary containment for liquids whose release could cause pollution.

Based on the reasonably foreseeable environmental impact of such a release, and noting the absence of a direct pathway to a highly sensitive receptor or evidence of actual pollution, NRW has assessed this breach of Permit Condition 3.2.3 as a **Category 3 non-compliance**.

Action 2: Provide NRW with:

1. Details of the repairs undertaken or proposed to restore the integrity of the bund.
2. Evidence demonstrating that all liquid wastes and chemicals currently stored on site are provided with compliant secondary containment arrangements.
3. Confirmation that a review of liquid storage and containment arrangements has been completed across the site to prevent recurrence.

Action response due 9th October 2026.

Permit Condition 1.1.1(a)

An identified non-compliance with a permit/licence condition is likely to be the symptom of an underlying issue. NRW assesses and records it, but we must also investigate further and try to identify the root cause**.** Tradebe's permit requires them to manage and operate the activities:

"in accordance with a written management system that identifies and minimises risks of pollution..."

Tradebe's recent EMS audit found that annual internal environmental compliance audits and process flow audits had not been completed during 2025 or 2026. NRW wishes to understand whether inspections of containment infrastructure, including bunds and other secondary containment systems, are intended to form part of the site's annual environmental compliance audits and process flow audits. If not, NRW requires details of the alternative management system arrangements relied upon to ensure that such infrastructure is routinely inspected and maintained.

Action 3: Provide NRW with:

1. Provide details of the scope and requirements of the annual internal environmental compliance audits and process flow audits, together with an explanation of why these audits were not undertaken during 2025 and 2026 and how this was allowed to occur within the site's management system.
2. Confirmation of whether inspections of secondary containment infrastructure are included within the scope of the site's annual environmental compliance audits and/or process flow audits.
3. Copies of the audit schedules, inspection procedures or other documented arrangements used to inspect and maintain containment infrastructure.
4. An explanation of how the deterioration of the bund occurred without being identified through

existing management system controls.

5. Details of the corrective actions implemented to ensure deterioration of containment infrastructure is identified and addressed at an earlier stage.

Action response due 9th October 2026.

CAR_NRW0051940 Actions 3 and 6.

Tradebe enquired whether responses to Actions 3 and 6 remain required in light of the Regulation 36 Notice. NRW can confirm that responses to both actions are still required.

The requirement to characterise the AOX fraction has not been superseded by the Regulation 36 Notice. Whilst the proposed installation of Granular Activated Carbon (GAC) treatment may represent a potential control measure, it does not in itself explain the source, composition, environmental significance, or fate of the AOX contributing to the recorded exceedances. This information remains necessary for NRW to complete its assessment of the non-compliance and to fully understand the root causes of the AOX exceedances.

With regard to Action 6, NRW wishes to clarify that the reference to drum, container and equipment washing activities was not intended to be limited to dedicated drum washing operations. NRW's concern is whether cleaning activities associated with sampling equipment, composite samplers, sample containers, process equipment, or other site equipment may contribute to AOX concentrations within the effluent stream or otherwise influence monitoring results. The review requested under Action 6 should therefore consider all relevant cleaning and washing activities that could have a bearing on the AOX monitoring results.

Action 4: Respond to actions 3 and 6. **Action response due 30th October 2026.**

Monitoring Records

The EMS audit recorded that the daily monitoring results spreadsheet for emission point S1 was blank for May and June 2026. It is therefore unclear whether the monitoring required by the permit was undertaken and not recorded, or whether the monitoring was not completed.

Permit Condition 3.5.2 states:

"The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data."

In addition, Permit Conditions 4.1.1 and 4.1.2 require that all records required by the permit are made as soon as reasonably practicable, retained for the specified period, and kept on site unless otherwise agreed in writing by Natural Resources Wales.

Permit compliance therefore requires both the completion of monitoring and the creation, retention and availability of appropriate monitoring records. The absence of recorded monitoring results for May and June 2026 prevents NRW from verifying compliance with the monitoring requirements specified in Table S3.3 and may indicate non-compliance with Permit Conditions 3.5.2, 4.1.1 and

4.1.2. Where monitoring was undertaken but records have not been retained or are unavailable, this would represent a failure to meet the permit requirements relating to record management. Where monitoring was not undertaken, this may constitute a breach of the monitoring requirements of the permit.

Action 5: Tradebe must confirm whether all monitoring required by Table S3.3 of Permit EPR/NP3233XX was undertaken during May and June 2026 and provide copies of the relevant monitoring records.

Where monitoring was undertaken but records were not created, retained, or are otherwise unavailable, explain the circumstances that led to the omission and identify the corrective actions implemented to prevent recurrence and ensure compliance with Permit Conditions 3.5.2, 4.1.1 and 4.1.2.

Action response due 9th October 2026.

Removal of Carbon Filter Abatement System

The EMS audit recorded that the carbon filter abatement system previously serving the oil storage tanks has been removed and that the tanks are currently vented directly to atmosphere.

NRW has not established from the audit evidence whether the removal of the carbon filter system was subject to a management of change assessment, whether NRW was notified of or approved the change where required, or how the operator has demonstrated that the removal remains consistent with permit requirements, BAT and the approved operating techniques.

Action 6: Provide NRW with:

1. The reason for removal of the carbon filter abatement system.
2. The date on which the system was removed and brought out of service.
3. Confirmation as to whether NRW was notified of, consulted on, or approved the removal of the system, and copies of any relevant correspondence.

Action response due 9th October 2026.

Other EMS Observations

There were a number of other observations within the EMS audit. Progress with these observations will be discussed at the next compliance meeting.

CAR_NRW0050640 – Action Mercury Monitoring Update Request (CAR_NRW0051940 Action 5)

As recorded in CAR_NRW0050640, Tradebe committed to undertaking an intensified mercury monitoring programme to demonstrate that mercury concentrations in the final effluent are consistently low and stable, thereby providing an evidence base for consideration of a reduced monitoring frequency.

NRW has now reviewed the results of the monitoring programme. A total of 34 effluent samples were analysed by an accredited external laboratory between January and June 2026. The permit emission

limit value (ELV) for mercury is 10 µg/L.

Monitoring results showed mercury concentrations ranging from <0.02 µg/L (laboratory limit of detection) to a maximum of 0.298 µg/L. No exceedances of the ELV were recorded. The highest measured concentration represents only 2.98% of the ELV, with the majority of results falling between approximately 0.05 and 0.10 µg/L, equivalent to less than 1% of the permitted limit.

A significant proportion of samples were reported at the laboratory limit of detection, indicating concentrations close to, or below, the analytical reporting threshold. The dataset does not show any increasing trend, unusual spikes, or evidence of significant variability throughout the monitoring period. Results remain consistently low despite sampling covering a range of operational conditions and waste streams treated by the installation.

The findings are consistent with information previously provided to NRW, including historic ALS monitoring data which also demonstrated very low mercury concentrations in the effluent. In addition, NRW notes that the operator's waste acceptance procedures require mercury-containing wastes to be identified and assessed during the pre-acceptance process, reducing the likelihood of mercury entering the treatment system.

Based on the data reviewed, NRW is satisfied that the monitoring programme has demonstrated that mercury concentrations within the treated effluent are consistently low and stable when compared with the permit ELV. The monitoring dataset provides a substantially larger evidence base than that previously available and indicates that mercury is not currently a significant contributor to the environmental risk posed by the discharge.

The highest measured concentration remains more than **33 times lower than the ELV**, whilst many results were below the laboratory limit of detection. Taken together, the results demonstrate a high level of compliance and provide evidence that mercury concentrations remain well controlled.

Conclusion

NRW considers that the intensified monitoring programme has successfully demonstrated that mercury concentrations in the treated effluent are consistently low and stable when compared with the permit ELV. The monitoring dataset provides a substantially larger evidence base than was previously available and indicates that mercury is not currently a significant contributor to the environmental risk posed by the discharge.

However, before NRW can consider any reduction in the current monitoring frequency, further clarification is required regarding the sampling, preservation and analytical arrangements used during the monitoring programme. Given the well-documented potential for mercury concentrations in aqueous samples to be affected by volatilisation, adsorption to sample containers and other chemical transformations, NRW requires assurance that appropriate preservation techniques and holding times have been applied throughout the monitoring period and that the reported results are representative of actual effluent concentrations.

Action 7: Tradebe shall provide details of the sampling and preservation methodology used for mercury analysis, including:

- Sample container type and material;
- Sample preservation procedures, including acidification and target pH;
- Sample storage conditions;
- Maximum holding times between sampling and analysis; and
- Confirmation that the methodology complies with the relevant accredited analytical standard.

Following review of this information, NRW will consider whether the available evidence is sufficient to support a reduction in mercury monitoring frequency.

Action response due 9th October 2026.

CAR_NRW0051940 action 7 - Periodic Groundwater and Soil Monitoring (permit Condition 3.1.4)

Tradebe were required to provide NRW with an update regarding the progress of groundwater and soil monitoring (permit condition 3.1.4) . Tradebe Responded stating- "*A first round of testing was completed on the 13th March 2026. The second round of testing was completed the 19th May 2026. We are currently awaiting the results*."

Tradebe shall submit the monitoring results to NRW as soon as they become available, together with an interpretation of the findings and an assessment of whether the results indicate any deterioration in soil or groundwater quality when compared with any available baseline data or previous monitoring rounds. NRW will review the results upon receipt and determine whether any further action is required. Until then, this action remains open.

Monitoring Returns

Hydrocarbon Oil Index (HOI)

Tradebe Gwent Ltd submitted the Sewer1 emissions monitoring return for the period 01/01/2026 to 30/06/2026 covering emission point S1. Schedule 4(b), Table S4.1 of Permit EPR/NP3233XX requires monitoring results obtained under condition 3.5.1 to be reported every six months. The return was submitted in accordance with this requirement and Tradebe is therefore compliant with permit condition 4.2.3.

For compliance assessment purposes, NRW applies the following methodology whereby six-monthly monitoring returns are assessed as though reported quarterly. This does not alter the operator's reporting obligations under the permit.

Review of the return identified a reported Hydrocarbon Oil Index (HOI) concentration of 111 mg/l from a sample collected on 11/06/2026, exceeding the permit ELV of 10 mg/l for emission point S1. The exceedance was notified to NRW in accordance with permit requirements.

Tradebe was originally required to monitor HOI on a monthly basis, under Schedule 3(b), Table S3.3 of the permit. However, following demonstration of consistently low and stable emissions, NRW agreed a reduced monitoring frequency of quarterly (CAR_NRW0040524) in line with BAT

Conclusions 7 and 20.

BAT Conclusion 20 states:

"Unless stated otherwise, emission levels associated with the best available techniques (BAT AELs) for emissions to water given in these BAT conclusions refer to concentrations (mass of emitted substances per volume of water), expressed in µg/l or mg/l. Unless stated otherwise, averaging periods associated with the BAT-AELs refer to either of the following two cases:

- *In the case of continuous discharge, daily average values, i.e. 24-hour flow-proportional composite samples;*
- *In the case of batch discharge, average values over the release duration taken as flow proportional composite samples, or, provided that the effluent is appropriately mixed and homogeneous, a spot sample taken before discharge."*

Action 8: Confirm whether the sample collected on 11/06/2026 was obtained from a flow-proportional composite sample or a representative spot sample from a well-mixed and homogeneous effluent stream.

Action response due 9th October 2026.

Following identification of the exceedance, Tradebe re-analysed the original sample and submitted a composite sample representative of the month of June. This produced a revised result of 43 mg/l for the original sample and 7 mg/l for the composite sample.

Tradebe have consequently committed to reinstating monthly monitoring and are in the process of installing additional carbon filtration to improve treatment performance.

Notwithstanding the subsequent verification exercise, the sample originally reported under the permit exceeded the ELV and therefore constitutes a breach of permit condition 3.1.2, which requires compliance with the emission limits specified in Schedule 3.

Action 9: The monitoring return references GIC-FID analysis for HOI, please confirm that the analytical method used complies with the requirements of **EN ISO 9377-2**.

Action response due 9th October 2026.

In determining the compliance category, regard has been given to the reasonably foreseeable environmental consequences of the breach in accordance with NRW's compliance framework.

The exceedance relates to an indirect discharge to sewer rather than a direct discharge to controlled waters. Consequently, the effluent is subject to conveyance and further treatment within the public sewerage network and sewage treatment works prior to any final discharge.

Hydrocarbon Oil Index (HOI) represents a broad range of non-polar hydrocarbons within the C10-C40 range, including diesel and lubricating oil fractions. Whilst a sewage treatment works may remove a proportion of these substances through physical separation, biodegradation and adsorption to sludge, treatment is not necessarily complete and the effectiveness of removal is dependent on the

characteristics of the hydrocarbons present.

There is no evidence that the exceedance resulted in pollution of controlled waters, disruption to the sewerage network, impairment of sewage treatment processes, deterioration in sludge quality, or any other actual environmental impact. The breach relates to a single monitoring result and is not considered indicative of a persistent loss of treatment performance.

Although the reported concentration significantly exceeded the ELV, the indirect nature of the discharge and the absence of evidence of actual environmental impact are mitigating factors. On balance, the reasonably foreseeable consequence is assessed as minor and the breach is therefore recorded as a **Category 3 non-compliance** against permit condition **3.1.2**.

Given the site's historical compliance record for HOI and the reduced monitoring frequency previously agreed by NRW on the basis of stable emissions performance, further investigation is required to determine the cause of the exceedance and to demonstrate that appropriate measures have been implemented to prevent recurrence.

Action 10: Investigate and report the root cause(s) of the elevated Hydrocarbon Oil Index (HOI) concentration identified in the sample collected on 11/06/2026. The investigation should consider, as a minimum:

- Any changes in waste inputs, treatment processes, operating conditions or throughput during the period preceding the sample.
- Whether there were any abnormal operating conditions, equipment failures, spillages or bypass events that may have contributed to the elevated result.
- Sampling and analytical factors that may explain the difference between the originally reported result (111 mg/l), the re-analysis result (43 mg/l) and the subsequently submitted monthly composite sample result (7 mg/l).

The investigation report should identify the most likely cause(s) of the elevated concentration and detail any corrective and preventative actions implemented, or proposed, to prevent recurrence.

Action response due 9th October 2026.

AOX

An assessment of the monitoring data identified an exceedance of the Adsorbable Organic Halogens (AOX) emission limit value (ELV) during May 2026. The permit specifies an AOX ELV of 1 mg/l for emissions to sewer from emission point S1. The reported result of 1.42 mg/L exceeded this limit and therefore constitutes a breach of permit condition 3.1.2.

NRW notes that this exceedance follows a series of AOX exceedances recorded during Quarter 1 2026 and is consistent with concerns previously identified regarding limited treatment capability for AOX, constraints in analytical capability, and insufficient characterisation of AOX within incoming waste streams. These matters remain under investigation.

Monitoring data indicates a continued failure to consistently achieve the permitted AOX emission

limit. AOX is a screening parameter representing a range of halogenated organic compounds, some of which may exhibit persistence, resistance to biodegradation and toxic properties. The discharge to sewer provides a potential pathway to environmental receptors via the receiving wastewater treatment works and associated sludge management routes. However, significant uncertainty remains regarding the composition of the AOX fraction present in the effluent and the environmental significance of the compounds contributing to the reported result.

Whilst a credible source-pathway-receptor linkage exists, NRW has not identified evidence of significant environmental impact arising from the exceedance. In view of the uncertainty regarding the composition, persistence and bioaccumulative potential of the AOX fraction, the reasonably foreseeable impact is assessed as minor. Accordingly, this breach has been categorised as **Category 3 (Minor) against permit condition 3.1.2**. This assessment is consistent with the approach previously applied to AOX exceedances at this installation.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form
If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales

Concerns Not Related to the Content of this Compliance Assessment Report Form
If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone**: 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email**: enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone**: 0300 790 0203
- **Email**: 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.