

Compliance Assessment Report CAR_NRW0037147

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 , Newport, NP19 4RD.

Type of assessment carried out: Unknown, Reason: Routine.

On 13/11/2020.

Parts of permit assessed: Permitted activities and recovery and disposal codes

NRW Lead Officer: Rebecca Green.

Report sent to: Alex Morris, Site Manager on 25/11/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	

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

Total number of 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?

No action required.

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 requested a meeting with Natural Resources Wales (NRW) to discuss proposed developments at their site in Newport.

A virtual meeting via Teams was held on the 13th November 2020.

Attending the meeting were the -

SHEQ Director, Tradebe;

Director, Treatment and Recovery Division, Tradebe;

Site Manager, Treatment and Fuels, Newport, Tradebe;

SHEQ Site Officer, Newport, Tradebe;

Rebecca Green, Senior Officer Industry Regulation, NRW.

The discussions were primarily concerned with the re-use of suitable waste water, after in-house treatment, in site washout and wash down operations. It is estimated that this will save the use of ~30,000m³ of potable water per year and reduce the volume of the site's emissions to sewer. There should also be a substantial reduction in the site's carbon footprint as tankers will be able to washout on site and there will also be carbon savings from the reduced use of potable water and the reduction in discharge to sewer.

Dwr Cymru Welsh Water have also been consulted about this proposal and have replied to Tradebe.

NRW have received comprehensive documentation concerning the proposal, including Operation of the Treatment Plant (PGTR 100, Issue 7), Pre-Acceptance (PACS 100, Issue 2), Reception, Inspection, Offloading and Storage of Bulk Waste (PGRH 100, Issue 7) and a COSHH Risk Assessment for the new operations. All the documents have been amended to include the proposed operations. Criteria for acceptance of suitable waste and for acceptance after treatment for use in the wash operations have been set and are clearly laid out in several of these documents.

Tradebe would like to clarify the use of R5 on Consignment Notes for waste water that is suitable, after treatment, for use in the washout and wash down operations.

Tradebe's EPR permit allows them to wash tankers out as a Directly Associated Activity (DAA) and R5 is also listed for the recycling /reclamation of other inorganic materials. Tradebe should ensure that the use of R5 is clarified in the permit variation which is being prepared following the publication of the BAT Conclusions for this sector.

This sort of project exemplifies the requirement to use raw materials efficiently which is written into all EPR permits and NRW will encourage and support all suitable proposals.

NRW have no objection to this proposal and for the use of R5 on Consignment Notes, providing that the waste meets Tradebe's pre-acceptance and post treatment criteria.

BAT Conclusions and Permit Variation

The BAT Conclusions for the Waste Treatment industry were published in August 2018 and all operators affected must comply with the requirements by August 2022.

Tradebe's resulting variation is nearing the draft stage, once complete it will be sent to them for comment. If they wish to add items to this variation they may be charged an hourly rate, depending upon the complexity of the additions.

Tradebe are investing a significant amount in the Newport site in order to ensure future compliance and would be well advised to check that any new processes are included in this variation.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.