

Compliance Assessment Report CAR_NRW0037441

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: Report/Data Review, Reason: Routine.

On 26/01/2021.

Parts of permit assessed: 3.1.2 Emissions to Sewer; 4.2.1 Annual Performance Report 2020

NRW Lead Officer: Rebecca Green.

Report sent to: Alex Morris, Site Manager on 01/02/2021.

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)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	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)	
H2 - Resource Efficiency - Energy efficiency	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

Forms S1, Emissions to Sewer, 1st October to 31st December 2020; SC1, Scrubber Operation, 1st July to 31st December 2020; Energy1 2020; Water1 2020 and PI1, Performance Indicators, 2020 were all received on 26th January 2021. The Performance Report 2020 was also received on 26th January 2021. Amended Form PI1 was received on 2nd February 2012. All the reports are accepted.

S1, Emissions to Sewer, 1st October to 31st December 2020

There are no emission limit values (ELV) in the permit for emissions to sewer.

SC1, Scrubber Operation, 1st July to 31st December 2020

SC1: The reported values for pH are above the ELV. Natural Resources Wales (NRW) were not informed of these breaches.

SC2 and SC3: pH values for both scrubbers were within their respective ELVs.

Energy1, Energy Usage 2020

Total overall energy use was less than in 2019, but the usage per tonne of production increased by more than 40%. Electricity consumption per tonne of production was more than 40% higher, gas consumption was more than 35% higher per tonne and oil consumption increased by more than 10% per tonne.

Water1, Water Usage 2020

Total water consumption decreased but use per tonne of production increased by almost 40%.

PI1, Performance Indicators 2020

Total annual production/waste accepted was more than 30% less than in 2019.

Overall, the amounts of waste and the amounts sent to landfill were less than in 2019. However, the amounts of non-hazardous waste and the amount sent to landfill were 18% and 21% higher per tonne of accepted waste than in 2019. The amount of hazardous waste per tonne of accepted waste was more than 25% lower than in 2019 and the amount of sent to landfill was more than 20% less than in 2019. The make up of waste accepted in 2020 seems to be different to that accepted in previous years.

Discharges to sewer were lower than in 2019, decreasing by more than 20% per tonne of accepted waste.

Performance Report 2020

A blocked sewer led to 7567m³ of what would otherwise have been discharged to sewer having to be taken off-site for disposal. The MCERTS flowmeter was inspected in October 2020.

Values for pH in the three site scrubbers are reported biannually to NRW. However, SC1 continues to operate outside its permitted ELV. NRW have not been informed of these permit breaches when they occurred. ***Tradebe are reminded of their responsibility to inform NRW of any permit breaches within 24 hours.***

The amount of filtercake produced continues to fall due to the nature of the wastes accepted.

A new effluent treatment plant is in the planning stages and should be commissioned and installed in Q1 2022. Tradebe have discussed their plans with NRW.

A water recovery system, primarily for tanker washout and site wash down, should be operational in 2021 and will save a considerable amount of potable water. Tradebe have discussed these plans with NRW.

A grass bank has been planted to attract and feed insects. This is a welcome development. There were no incidents in 2020.

Business has been difficult for all industries this year. Tradebe accepted significantly less waste in 2020, but running costs for a site of this size will not have reduced proportionately, hence the apparent increase in the use of resources. NRW hope that Tradebe will be able to investigate ways of reducing their energy and water consumption in the coming year. The installation of the water recovery unit should help them to start to achieve some reductions.

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.