

Compliance Assessment Report CAR_NRW0037017

Permit being assessed: NP3233XX.

For: BRIDGEND WASTE MANAGEMENT CENTRE, held by Tradebe Gwent Limited

At: FACTORY LANE PENCOED , BRIDGEND, BRIDGEND, CF35 5BQ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 25/09/2020 between 10:00 and 12:30.

Parts of permit assessed: Annual submissions and action response

NRW Lead Officer: Andi Kemp.

Report sent to: Alex Morris, Site Manager Treatment on 09/10/2020.

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)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F5 - Amenity - Deposits on road	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Compliance Assessment Report (CAR1) Tradebe Bridgend Waste Management Centre: EPR/NP3233XX – 9th October 2020

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Purpose Of Compliance Assessment

This CAR1 covers the following aspects of regulatory activity:

- Previous Actions – CAR1 23rd April 2020
- Annual Report 2019
- Routine 6 monthly sewer release data – period ending June 2020
- Remote Intervention: 7th May 2020
- Routine Inspection: 25th September 2020
- Future compliance assessment work

Previous Actions

The CAR1 from April 2020 included three actions.

Action 1 concerned the missing submissions – annual report required by permit condition (p.c.) 4.2.1 (parts a) – e). This was received on 18th May 2020 and is assessed further on in this CAR1. **Action closed.**

Action 2 concerned the ammonia results, being higher than the permit ELVs. A previous CAR1 indicated that this should be addressed in the Waste Treatment BRef IED review. The DCWW trade effluent consent gives a limit of 1500 mg/l ammoniacal nitrogen; the permit ELV is 500 mg/l. The previous 6 monthly submissions showed NH₃ / NH₄⁺ results higher than the permit ELV, but within the TEC. This will be addressed in the IED permit review against the BAT Conclusions published in August 2018. There are no BAT AELs for ammonia for indirect discharges, however the permit review process will look at the data provided for the emissions inventory and impact assessment (applying the requirements of the Water Framework Directive) to see if any appropriate, protective ELVs need to be included in the permit – taking account of sewage treatment reduction factors of the receiving STW. **Action closed.** BAT standards are likely to be tighter (where protection of the environment is required) than TEC limits.

Action 3 concerned the output from IP4 H1 impact assessment for releases to sewer on receiving water environment (due in Oct. 2008) – this has now been overtaken by the IED review as discussed above when concerning permit limits. **Action closed.**

Annual Report 2019

This brief report covers the 5 sub points required by p.c. 4.2.1. This report discusses the flow monitoring, composite sampling and subsequent analysis (at Bridgend and Newport), use of third party laboratories for QC/QA and the DCWW sampling and analysis. Waste inputs and outputs are recorded on the Tradebe integrated system. Quarterly waste returns are submitted to the Regulator. Permitted tonnages of waste

annual throughput are 115,000 t (with no more than 75,000 t being hazardous), with waste input being declared as 27,910 t for 2019. Out of this approximately 77 t of oil was recovered. The raw materials used (flocculants and coagulants) are given. New CCTV surveillance was installed in 2019, linked to the out of hours service. There is brief mention of a trailed new centrifuge and removal of some redundant treatment equipment.

The operator is reminded to submit the returns by the due data as stipulated in the permit.

Routine 6 Monthly Sewer Release Data – period ending June 2020

Data for the 6 months ending June 2020 has been received. At this stage the actual assessment of sampling and analysis has not been conducted, NRW accepts these results at face value at this time – see Future Compliance Assessment Work. All results were compliant, except: ammoniacal nitrogen – discussed above; and one result for total sulphide, with a result of 6.5 mg/l against an ELV of 3 mg/l (batch 2 17th Feb. 2020).

A non-compliance has not been applied yet, pending Action 1 below.

Action 1 Tradebe Bridgend WMC: *Confirm if this is not an error; did duplicate samples show the same; any explanation?* **Due: 31st October 2020.**

Daily mass limits were compliant except ammoniacal nitrogen – see above.

Remote Intervention: 7th May 2020

A Skype call was arranged for May 7th, where both Newport and Bridgend were discussed – Newport is in the process of being handed over to NRW SE Industry team. Here it was discussed that waste inputs are down due to COVID-19, but operations were being conducted as normal with no additional risk. The out of hours surveillance system was discussed, briefly: someone is always on 24 hr call, with access to CCTV, where police and FRS can be called if necessary. The FRS are familiar with the sites. Key personnel have been shielding and this led Alex Morris to provide cover as TCM and general oversight at Bridgend.

Routine Inspection: 25th September 2020

The brief inspection (under COVID-19 safety rules and distancing) confirmed that key personnel at Bridgend were back on site.

Action 2 Tradebe Bridgend WMC: *Confirm if Andrew Price TCM status is up to date – expired 6th July 2020. If not, who is acting up?* **Due: 31st October 2020.**

The only items examined today were the effluent flow routes, flow meters and sampling point. Firstly, the sewage only discharge manifold flows passed its own flow meter and enters a short section of Tradebe pipeline, before entering the DCWW main sewer. No other effluent (unless coupled to the manifold) can enter this line. Next, the four leachate holding tanks (where after sampling it is decided whether to route to full treatment or discharge), also run passed their dedicated flow meter and into the composite sampling chamber, before joining the short length of pipeline with the sewage discharge. Lastly, any treated effluent from the main treatment process also flows passed a dedicated flow meter, to the composite sampling

chamber and thence onwards as per the leachate. The composite sampling chamber is emission point S1.

The aspect of treating or simply discharging leachate may be looked at under the IED review and if not, certainly as an ongoing regulatory BAT topic. A discussion took place about activities, ELVs and consolidation of the sewage activity via the IED review – an email was sent to AM 1st October 2020 – copied below:

In terms of the sewage aspect covered by the GP permit, your main permit (NP) for the installation, even though it contains Ch. 20 septic tank waste code, does not have this aspect covered in your permitted activities (Table S1.1) as these are all installation references for hazardous waste 5.3. So this needs to be listed as a separate waste operation (both waste operations and waste installations are EPR regulated facilities, but the installation activities are listed in Part 2 of Schedule 1 EPR), as there is no 5.4 installation activity for this non hazardous septic tank waste, therefore = waste operation – see attached permit which shows how we can have an installation and waste operation (in this case a transfer station) in the same permit – however we bill installations (based on full banded OPRA profile) separately from waste operations (simpler waste OPRA profile).

I am unsure at this late stage if NPS can process all this within the IED review, as they are strictly only assessing your compliance with BAT – so a separate permit variation may be needed. I advise that you check the draft – see how the activities are listed (as we know the three current 5.3 activities may not be correct, e.g. biological treatment and solvent reclamation – I believe you need the 5.3 for physic – chemical and the 5.3 for blending, prior to the main activity – then we have to consider the sewage bit) and raise it with NPS – then we'll go from there.

The general set up benefits from primary, secondary and tertiary containment, although looking tired in parts, it still provides some protection from spills / losses. The extent of what the small on-site laboratory can do was briefly touched on and the future is being considered amongst other Tradebe projects.

Future Compliance Assessment Work

It is sensible to wait for the imminent issue (after consultation on draft) of the reviewed permit and any associated Improvement Conditions, before carrying more detailed assessment of site procedures, maintenance etc. Below are three areas that will certainly be looked at in more detail with the reviewed permit:

1. Assessment of sampling and analysis and on what basis.
2. Leachate treatment or discharge.
3. Maintenance of primary and secondary containment and treatment equipment.

Action 3 Tradebe Bridgend WMC: *Confirm what flow meters are certified under the MCerts scheme. Due: 31st October 2020.*

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.