

Compliance Assessment Report CAR_NRW0037941

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: Site Inspection, Reason: Routine.

On 05/05/2021 between 10:00 and 14:30.

Parts of permit assessed: Handover visit

NRW Lead Officer: Rebecca Green, accompanied by Andi Kemp.

Report sent to: Alex Morris, Site Manager on 07/05/2021.

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)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
E2 - Emissions - Land and groundwater	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

The purpose of this visit was to hand over regulation of this site from Andi Kemp to Rebecca Green by meeting site personnel and getting an overview of the site layout and processes carried out there.

Present at the meeting were -

CB, Divisional Director, Treatment and Recovery Division, Tradebe;
JW, Operations Manager, Tradebe;
AM, Site Manager, Tradebe;
RD, SHEQ, Tradebe;
Andi Kemp (AK), Lead Specialist Industry Regulation, SC Wales, Natural Resources Wales (NRW);
Rebecca Green (RVG), Senior Officer Industry Regulation, SE Wales, NRW.

Agenda

1. Introductions –
NRW staff and responsibilities;
Tradebe staff and responsibilities.
 2. Tradebe business update –
processes, projects, pilot plants, performance;
changes in wastes streams;
EU Exit;
REACH.
 3. Site and process overview, including laboratories, followed by site tour and inspection.
 4. Permit variation following BATC publication –
improvement conditions;
reporting requirements pre and post August 2022;
DCWW consent, new limits.
 5. The future
NRW regulation, to be discussed following plant and process tour;
Tradebe business plans.
 6. AOB
- (Agenda items were not necessarily discussed in the order given above).

1. Introductions

Those attending the meeting introduced themselves and the reason for the change of NRW site officer was explained.

4. Permit Variation

Groundwater and soil monitoring: The need for 5 yearly monitoring of groundwater and 10 yearly monitoring of soil was discussed at length. This requirement was introduced when the Industrial Emissions Directive (IED) was adopted. Tradebe already take samples annually from the boreholes on-site, but their laboratory staff are not MCERTS accredited nor is the laboratory ISO17025 accredited. RVG suggested that all the data is collated and reviewed to determine any trends or changes. This review should then be sent to NRW so that an appropriate course of action can be determined.

Soil monitoring is much more problematic. All of the site sits on a thick concrete base which is on top of a membrane. Taking soil samples would breach this membrane, increasing the risk of ground contamination, which is rather counter-productive given the aims of the IED. There may be some scope to avoid taking soil samples. Tradebe should follow the relevant guidance (H5, RGN9 and EC Guidance) to determine their next steps. RVG emailed the guidance documents to Tradebe on 6th May 2021.

Action 1: Tradebe to review all groundwater monitoring results. Send a report to NRW identifying any trends or changes by 6th August 2021.

Action 2: Tradebe to prepare a Site Condition Report, following the guidance above, justifying the argument that 10 yearly soil testing is unnecessary. NRW to receive the report by 6th August 2021.

Emissions to sewer: The new permit requires Tradebe to monitor emissions to sewer daily and report quarterly. They should continue to use DCWW results for the quarterly reporting as the analytical laboratories used by DCWW are ISO17025 accredited. If the daily internal monitoring reveals a permit breach Traded should notify NRW using the Schedule 5 Notification procedure.

Schedule 1 - Operations: Activities A1, A2 and A4 in Schedule 1 Table S1.1 give the limit on the Waste Transfer Facility as 500 tonnes, with no definition. This must be clarified. Directly Associated Activities A6, A7 and A8 also have limits whose timescale is not defined. These should also be clarified.

The total volume and tank identification in A2, A3, A4 and A5 should be removed as they are unnecessary. The installation has the capacity to treat more than 50m³/day, bringing it within the scope of an EPR Schedule 1 activity, any further description is not required.

Tradebe would like R12 added to activity A5 and R5 added to activities A3, A4 and A5 for re-use of treated water in the tanker washout plant.

Schedule 2 - Waste types, raw materials and fuels: This list is incorrect. It is not the same as the list in their present permit and should be replaced with the current list from permit variation V008.

Tradebe would also like to add some waste codes to cover the use of the new effluent treatment plant (ETP) after it is installed. This may not be feasible, it will be up to Permitting in NRW to decide.

Action: RVG to contact Permitting and inform Tradebe of the outcome.

2. Tradebe Business Update

Tradebe are planning a significant investment in a new ETP, enabling them to comply with the emission limits that will apply from August 2022.

There is an opportunity to send waste sulphuric acid for re-use in a water treatment process. The waste acid would be tested by Tradebe on receipt and if it met the specification would be sent on for re-use. RVG suggested that the acid could be classified as "end of waste" if it passed the quality control test and met the specification, allowing it to be sent out as a material rather than a waste. NRW do not have an End of Waste panel, so Tradebe should follow the procedure given in "Is it waste" and record their assessment for future reference.

Tradebe are planning to bulk flammable waste into ~200L drums in the Waste Transfer Facility. The activity is already listed in Schedule 1. They do not plan to install local exhaust ventilation; there

will be no emission points. Tradebe are advised to assess the immediate area for fugitive emissions when the operation is running so that they can decide whether any abatement or further action is necessary.

Action 3: Tradebe to assess fugitive emissions when the operation is running and record the results.

Activity A10 permits Tradebe to treat <50 tonnes/day of non-hazardous waste using biological treatment. They would like to use this process to remove alcohols from an existing waste stream. NRW have no objection, as long as an odour management plan is in place.

3. Site and Process Overview. Site Tour and Inspection

The site layout and processes were explained.

The site tour started in the laboratories, then moved from waste reception through treatment to the filter cake building and included the waste transfer facility.

The site was generally well-ordered, clean and tidy. The bunds in the filter cake building need some attention as they are showing wear where they meet the floor and on the top.

6. The future

Tradebe's business plans were discussed previously, (see item 2).

NRW's compliance work in the coming year is likely to be largely concerned with the new permit and Tradebe's proposed new treatments and processes. An OMA will probably be conducted before the new monitoring requirements come into effect.

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.