

Compliance Assessment Report CAR_NRW0038423

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 29/04/2021 between 10:00 and 12:00.

Parts of permit assessed: Site Activities

NRW Lead Officer: Geraint Harris, accompanied by Andi Kemp.

Report sent to: Alex Morris, Site Manager on 21/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B5 - Infrastructure - Plant and equipment	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 Bridgend

29TH April 2021 Site Visit and Handover.

As a result of changes to the regulatory team at NRW, Geraint Harris has now replaced Andi Kemp as the regulatory officer for Tradebe Bridgend. A site handover meeting and tour was undertaken at 10:00 on the

29th April 2021.

Following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment. Natural Resources Wales initiated a review and variation to vary Tradebe Bridgend's permit. As part of this variation the two environmental permits active at this site (Permit NP3233XX and GP3298FY, a former Waste Management Licence) have been consolidated into one permit (Permit NP3233XX).

A discussion regarding this variation was undertaken with Tradebe Highlighting a number of important concerns. The most pertinent being the disparity between the progress of the variations at waste sites between England and Wales. Tradebe have highlighted a concern that Welsh Installations may be at a commercial disadvantage if there were to be any delays to issuance of varied permits in England. The site had a number of other queries regarding the varied permit and although briefly discussed, it was discussed that such questions are better directed towards the permitting officer.

Information relating to the monitoring of groundwater boreholes will be sent on an additional email.

The installation has a single treatment process that involves the physico-chemical treatment with mixing and blending activities for hazardous wastes. Resulting effluent from the treatment process is disposed to sewer. The installation also accepts non-hazardous leachate for disposal to sewer which depending upon the testing of its properties can be passed through the main treatment process. Sewage waste is also accepted and disposed of to sewer.

A detailed guided tour of the site with the Site supervisor and Site Manager was undertaken. This involved looking at and discussing the various aspects of the site's activities including waste storage vessels, treatment and separation processes, such as pH adjustment, settlement, coagulation and flocculation, DAF and blending compatible wastes. The recovered oils are stored in dedicated vessels, sludge is sent off for further treatment at other permitted sites and landfill leachate is received in separate vessels and discharged to the sewer if analysed to be within acceptable parameters.

The hardstanding base covering the whole operational area was found to be in excellent condition during the visit. The whole engineering works including the various tanks and associated pipework were found to be in a satisfactory condition. The site has a small laboratory where it undertakes compatibility checks and final effluent checks. They also have the use of Tradebe Gwent's Lab for pre-acceptance checks on various waste material. The site supervisor gave a benchtop demonstration of the daff plant showing the separation of the materials following the introduction of Iron Chloride.

The permit requires the following be submitted, on the appropriate forms, to the regulator:

- Emissions to sewer – every 6 months
- Annual treatment tonnages of hazardous and non hazardous waste
- Annual water, energy and raw material usage
- Records of waste accepted and transferred must also be made and submitted every quarter

The emission point to sewer S1 has associated limits as prescribed in Table S4.3. There are no other permitted releases to any media, except for uncontaminated surface water. Condition 3.6.3 requires (unless otherwise agreed in writing by NRW) monitoring and analysis should be carried out in accordance with the MCERTS scheme. Improvement Programme item IP3 required the effluent discharge flow rate to be monitored to the MCERTS standard. There are two flow meters, one measuring the installation discharge to sewer and the other measuring the domestic sewage. The site supervisor showed us the location of the final effluent

discharge to sewer and the associated flow meter. At the time there was no flow due to the treatment process being a batch process and no treatment was being undertaken.

On a final note, the site has designated an area of grassland and sown wildflowers for the purpose of supporting the local bee population. This is welcome addition and supports NRW's goal for sustainable management of natural resources.

The following records have been submitted:

Waste returns: Jan-March 2021 for both permits – No inconsistencies found.

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.