

## Compliance Assessment Report

Report ID:  
CAR\_NRW0031471

This form will report compliance with your permit as determined by an NRW officer

|                              |                                                        |             |            |     |     |
|------------------------------|--------------------------------------------------------|-------------|------------|-----|-----|
| Site                         | Gwent Waste Management Centre<br>NRW/EPR/SP3531SK/V007 | Permit Ref  | SP3531SK   |     |     |
| Operator/Permit holder       | Tradebe Gwent Limited                                  |             |            |     |     |
| Regime                       | Installations                                          |             |            |     |     |
| Date of assessment           | 05/04/2017                                             | Time in     | N/A        | Out | N/A |
| Assessment type              | Report/Data Review                                     |             |            |     |     |
| Parts of the permit assessed | 2015 & 2016 ROUTINE AND ANNUAL DATA                    |             |            |     |     |
| Lead officer's name          | Kemp, Andi                                             |             |            |     |     |
| Accompanied by               |                                                        |             |            |     |     |
| Recipient's name/position    | Mark Griffiths/ Gwent Regional<br>Business Manager     | Date issued | 06/04/2017 |     |     |

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

| Permit conditions and compliance summary | CCS<br>Category | Condition(s)<br>breached |
|------------------------------------------|-----------------|--------------------------|
|------------------------------------------|-----------------|--------------------------|

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.

**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

**O** = Ongoing non-compliance, not scored.

|                                |   |                                                              |   |
|--------------------------------|---|--------------------------------------------------------------|---|
| Number of breaches<br>recorded | 0 | Total compliance score<br>(see section 5 for scoring scheme) | 0 |
|--------------------------------|---|--------------------------------------------------------------|---|

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

### **Purpose of Compliance Assessment**

This compliance assessment form (CAR1) covers the following regulatory aspects:

- Routine quarterly monitoring for sewer emissions: Jan 2015 – Dec 2016
- Scrubber liquor pH every 6 months: Jan – Jun 2015; Jul – Dec 2015; Jan – Jun 2016; Jul – Dec 2016
- Annual performance reporting and parameters
- Permit variation vs IED variation and deadline
- Reminder of requirements of certain permit conditions:
  - 1.3.1(b) – energy efficiency review
  - 1.4.1(c) – raw material and water use review
  - 2.7.3 – site Closure Plan

A separate CAR1 form will be produced for the recent scrubber performance inspection.

### **Quarterly S1 Sewer Data**

The required data (parameters and frequency) have been reported. The operator now includes the analytical method used by DCWW and whether they are UKAS accredited or not for that determinand.

As per recent OMA, the operator should periodically check the monitoring methods used are extant and up to date – ref. M18 guidance.

Typically the metals are quite low, with ammonia, suspended solids and flow varying as the waste inputs vary. There are no limits set as the DCWW TEC controls the limits.

## **Scrubber Liquor pH Results**

All the results are compliant. The pH is recorded daily and during the recent (Mar 2017) scrubber inspection – see separate CAR1 – the acid scrubber solution pH was discussed. Also discussed was the verification of the scrubber liquors staying in range throughout the day – possible area to conduct some tests or take a second pH reading later in the day.

## **Annual Performance Parameters and Reporting 2015 and 2016**

2015 – notable points are:

- Working with DCWW to improve effluent quality
- Automated dosing of sodium hydroxide solution to SC1 secondary acid scrubber
- Filter cake : tonnage of waste treated ratio – aiming for 0.25 and there appears to be a trend towards this from 0.31 in 2008
- Bunds inspected to CIRIA C736
- New appointments to improve operations

2016 – notable points:

- Flow meter received MCerts site conformity certificate
- Filter cake : waste treated ratio down to 0.22
- Tradebe launched national SHEQ priorities – known as PROUD

Energy use has decreased and has water use and the waste treated has increased – this is welcomed. The water used per tonne of waste treated has decreased from 0.208 (2015) to 0.139 (2016). Effluent discharged has increased. It is difficult to identify positive trends with this type of waste treatment industry. It appears that the site is looking at effluent quality, water use and better routes for filter cake with metal recovery.

## **Permit Variation**

The deadline to submit a draft was 31<sup>st</sup> Mar 2017 – this has been extended and now depends on the answer from NRW permitting with regard to can the elements required to be varied be included in the IED review. This is complicated by the unknown date of permit reviews – although it is understood that the Waste

Treatment BRef is in final draft stage – AK is waiting for NRW NPS to answer these queries. It may be that the operator pays for an initial variation to address previously identified issues and subsequently pays for a second variation for IED when served the Regulation 60 notice by NRW.

#### **Other Work Required by Permit Conditions**

- 1.3.1(b) – energy efficiency review – needed every 4 years – operator doesn't need to submit this, but must have evidence that a review has been carried out
- 1.4.1(c) – raw material and water use review – as above
- 2.7.3 – site Closure Plan – operator to submit plan (see guidance in CAR1 Mar 2015) by 31<sup>st</sup> Dec 2017.

**END**

## EPR Compliance Assessment Report

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CAR\_NRW0031471**

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|                        |                                                        |            |            |
|------------------------|--------------------------------------------------------|------------|------------|
| Site                   | Gwent Waste Management Centre<br>NRW/EPR/SP3531SK/V007 | Permit Ref | SP3531SK   |
| Operator/Permit holder | Tradebe Gwent Limited                                  | Date       | 05/04/2017 |

### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

| Criteria Ref.       | CCS Category | Action required/advised | Due Date |
|---------------------|--------------|-------------------------|----------|
| See Section 1 above |              |                         |          |

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

| CCS category | Description                                                          | Score |
|--------------|----------------------------------------------------------------------|-------|
| C1           | A non-compliance that could have a major environmental effect        | 60    |
| C2           | A non-compliance which could have a significant environmental effect | 31    |
| C3           | A non-compliance which could have a minor environmental effect       | 4     |
| C4           | A non-compliance which has no potential environmental effect         | 0.1   |

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.