

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

Site	Gwent Waste Management Centre NRW/EPR/SP3531SK/V007			Permit Ref	SP3531SK		
Operator/ Permit holder	Tradebe Gwent Limited						
Date	13/03/2015			Time in	10:00	Out	16:00
What parts of the permit were assessed	Monitoring & Annual Submissions, Previous Actions (Containment / pre acceptance), Inspection (maintenance, accident management)						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Mark Griffiths, Site Manager						
Officer's name	Andi Kemp			Date issued		01/05/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	A	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	C4	3.1.2
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	A	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	A	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

These are the main points discussed during the inspection on Friday 13th March 2015. Please review and supply any comments within 14 days.

Routine Monitoring Submissions (permit conditions 3.6.1 and 4.2.2)

Routine submissions received:

Oct – Dec 2013 – S1 and SC1 – SC3; Jan – Mar 2014 – S1; Apr – Jun 2014 – S1 and SC1 – SC3; Jul – Sep 2014 – S1; Oct – Dec 2014 – S1 and SC1 – SC3.

S1 = emission to sewer and SC1 – SC3 = scrubber pH. There are no emission limits for releases to S1 (there is a Welsh Water Trade Effluent Consent) and the three scrubbers have pH limits to meet.

No ELVs breached, except where mentioned below and all points monitored. MG advises that emission point SC5 ammonia scrubber was never commissioned – hence this point's result is always declared as N/A on the monitoring return. The emission point was put into the permit by variation V002, but the ammonia waste treatment business never commenced.

At S1 the permit requires ammonia as unionised ammonia expressed as N to be reported. The monitoring submissions report this parameter as ammonium, which is usually taken to be the ionised form. At pH up to 8, 99% of ammoniacal nitrogen will be in the ionised form, NH_4^+ , so it is important that the analytical method and any subsequent conversion calculations provide the information on the unionised form. This is usually the critical parameter because of its effect on the aquatic environment and its ability to form chloramines in sewage treatment works. MG submitted procedure: PGLA 108 Distillation of Ammoniacal Nitrogen Issue 1, which appears to provide a result for free unionised ammonia.

Action 1 Tradebe 130315: Check your monitoring methodology and calculations and cross reference with the actual parameter listed in the permit and clarify that the result reported is the same as the parameter required by the permit. **Due:** 31st May 2015.

The monitoring of S1 requires every batch to be monitored (and results reported every three months) and flow monitored continuously (and reported as daily average reading for each day); the submissions appear to represent just one reading taken for monitoring data reporting purposes.

Action 2 Tradebe 130315: Confirm on what basis the monitoring data is reported and cross check with permit requirements and propose a way of obtaining and reporting the data the permit requires. Within this action an alternative proposal can be presented for NRW to evaluate and possibly authorise the site to adopt. **Due:** 31st May 2015.

It was noticed in the Jul – Dec 2014 submission for SC3 that a result from 25th July 2014 exceeded the permitted limit: pH 7.5 against a permit limit of equal to or greater than 10 (as this is the primary acid scrubber). MG submitted a Schedule 6 notification (as required by permit conditions 4.3.1 and 4.3.2) and follow up investigation in Part B on 30th July 2014, following a telephone conversation between AK and MG. It is agreed that due to SC1 the secondary scrubber, no release of acid fume would have affected the environment at these levels and duration of incident. The investigation has generated a Capex proposal to come up with an engineered solution so caustic dosing is maintained. As reported by the Schedule 6 notification, no treatment, dosing or sampling appeared to take place over the weekend 26th and 27th July 2014, and although we welcome whatever solution you design to ensure correct dosing, a minor non compliance of Category 4 (no impact) will be applied.

Non Compliance: A minor non compliance C4 has been given for a breach of permit condition: **3.1.2.** *It is an offence under Regulation 38(2) of the Environmental Permitting Regulations (as amended) 2010 to breach a permit condition.*

Action 3 Tradebe 130315: Please provide details of the engineered solution you allude to in the Scheduled Notification of 30th July 2014. **Due:** 31st May 2015.

Annual Submissions (permit condition 4.2.1)

Submissions received:

Annual report, EMS targets, results review, raw materials used, waste, energy and water consumption performance indicators for 2013 and 2014 received.

2013 – rec'd Jan 2014: This submission provides useful information on site performance, enabling targets to be set and evaluated and trends observed for some indicators, as performance driven by waste amount and type treated in any given year, which varies year on year. Some notable points are:

- Maintenance and cleaning of the main scrubber.
- Upgrade of auto sampling equipment for the discharged effluent – based on flow proportions, not time weighted, which probably better reflects the batch process and variability of the effluent flow.
- MCerts accreditation for flow – **Has the site conformity status with the MCerts standard been extended – see Action 4 below.**
- Further work to be undertaken into reducing levels of sulphate and metals in discharge.
- Filter cake produced per tonne of waste treated is decreasing, which is a welcome trend. **See Action 5 below.**
- No contamination incidents reported during the year.
- Integration of the Tradebe SAP system.
- Senior personnel changes: new Site Manager and SHEQ Manager.

Action 4 Tradebe 130315: Site to provide evidence that the flow meter and flow measurement arrangements have an extant Site Conformity Certificate for 2014 – 2019. **Due:** 31st May 2015.

Action 5 Tradebe 130315: Site to provide the sampling, characterisation and assessment methodology applied to the filter cake that leads to the classification of the cake as hazardous waste or non hazardous waste and hence what class of landfill the waste is destined for. **Due:** 31st May 2015.

Action 6 Tradebe 130315: Site to confirm the fate of the hazardous waste sent off site in 2013 and 2014. **Due:** 31st May 2015.

2014 – rec'd Feb 2015: In addition to items from the submission for year 2013, some highlights from 2014 are:

- Less waste than 2013.
- Some waste to hazardous landfill.
- More water used.
- Less electricity and natural gas used; more gas oil used.
- More effluent to sewer.
- Management team and chemistry team enhanced with new appointments and restructuring.

As previously stated trends on water use, energy use, waste produced, waste sent to landfill etc. are linked to the amount and type of waste treated and so vary year by year, making any useful statement about performance efficiency difficult. For

example:

Parameter	2013	2014
Total waste input (t)	57,792	55,239
Water used (mains m3)	13,187	14,215
Effluent discharged (m3)	42,246	52,757
Waste sent to landfill (t)	13,093	14,903
Hazardous waste sent off site (t)	2,094	2,708

From the above it can be seen that lower waste inputs do not necessarily mean lower water use, lower effluent released, less waste to landfill.

It is clear however, that Tradebe have a process for setting improvement objectives and reassessing the way business is carried out with a view to maintain permit compliance and reduce impact on the environment. NRW will work with Tradebe to further explore new and revisit formerly assessed aspects, such as evaluating continuing technical competence, protection of soil and groundwater, treatment techniques, waste acceptance and storage.

Previous Actions and Former EA Audits

Previous Actions

From previous CAR1 forms, three actions were given. A variety of correspondence has been submitted and all three actions have been completed. They refer to carbon filter change (HD4); calibration of the pH probe (HD5); storage procedures in waste reception area (HD2). MG submitted documents on 6th Jan and 31st Jan 2014 - this completes two of the actions: originally HD4 and HD5 (of CAR1 13/08/13), renamed Actions 1 and 2 of CAR1 02/09/13, finally being consolidated as Action MG1 (of CAR1 12/12/13).

Re. HD4 the carbon filters used in the LEVs of the transfer station building will be replaced every 24 months – this is based on maximum loading over maximum hours, with a maximum flow rate of 1000m3/hr (500m3/hr per filter – 2 filters used in parallel) – actually tested and found to be 955m3/hr.

Re. HD5 calibration points for the pH probe used for the scrubbing solution testing of the pH of the alkaline scrubber solution (< or equal to 5) and the acid scrubber solution (equal to or > 10), procedure PGLA 116 Issue 2 (Oct 2013) Determination of pH, was submitted. This procedure describes the use of calibrating buffer solutions at three pH values: 4, 7 and 10.

Re. HD2 storage procedures for waste in the reception area, the previous regulatory officer noted a revised procedure for waste reception was supplied and this completed the associated action raised in CAR1 13/08/13, and completed in CAR1 02/09/13. Procedures have been revised since and MG supplied: PGRH 102 issue 2 (Mar 2015), risk assessment for storage and segregation of package waste (Mar 2015), lab smalls packing (PGRH 104 Issue 1, 13th Jan 2011) and a revised version that will replace the aforementioned (PDRH114). Ongoing assessment of waste pre-acceptance, actual acceptance on site, reception storage and waste segregation will take place, revisiting these procedures. Some of the pertinent points from procedures: PGRH 101 (Acceptance of Containerised Waste) and PGRH 102 (Storage of Containerised Waste) are:

- Document control and links to related documents.
- Waste arrives only when qualified people on site and capacity to receive.
- Consignment note checks.
- Quarantine and rejection procedures.
- Checking of condition of containers and labelling.
- Verification of contents by analysis, complementing information in consignment paperwork.
- Segregation of waste load types and pallet height for off-loading, reception and transfer station areas.
- Reception and quarantine areas drain to sealed sump in main process building – accept small risk of incompatibility issues from mixed waste leaks, but risk assessment states 5 days maximum in reception area, spill kits and 3m gaps kept between aisles in accordance to HSG71.

- Transfer station sumps are blind for each containerised compartment* see comments under inspection re. planned maintenance and inspection regime for the interceptor.

From a previous CAR1 form, two recommendations were given: arrange for pre-application discussions re. permit variation for new treatment tank project– see Other Discussion section below – Capex approval was given in Feb 2014; and secondly to review OPRA profile – see section on OPRA later on.

EA Audits

Previously two significant EA audit campaigns were conducted at the site, namely: (i) Pre – acceptance and Acceptance Procedures, June 2008 (also refers to Jan 2008 desk based audit, where questions were reviewed) and (ii) Containerised Waste Storage, Oct 2012. These audit campaigns sought to check sites compliance with the sector guidance note on waste storage and treatment. S5.06 (Issue 4 2004). *Note, in line with IED, new sector guidance and standards and emission levels will be issued following the review and re issue of the Best Available Technology Reference document (BRef) conclusions – this is currently being review at an EU level.*

Aspects of these two areas of the waste storage, transfer and treatment sector will form part of the ongoing compliance assessment plan; some points to note (which may have been addressed by Tradebe by now) are:

- Pre-acceptance sampling not BAT
- Issues with labelling and old labels on containers
- Quarantining of waste
- Wash out certificates for tankers
- Taking 7 days to verify lab smalls packed by customers
- Transfer station storage bays to be more clearly labelled
- Up to date layout and drainage plans; colour coding of drains
- Follow HSG71 and justify any deviations
- Inspection and maintenance of critical infrastructure
- Storage of aerosols

Responses off Tradebe to address the above include: Letter re. Containerised Storage Audit Actions, from Andrew Crowther, 29th Nov 2012. Actions tracking table (Containerised Waste Audit) sent by Tim Lay, 11th Jan 2013. Further updates off Helder Daravano, included in CAR1 13th Aug 2013. Letter off Tim Lay, 28th Aug 2013, includes updated Actions Tracking Sheet – Containerised Waste.

Action 7 Tradebe 130315: Site to arrange with NRW a meeting and inspection to run through some of the points from both audits – this is seen as relevant due to changes in staff at Tradebe and NRW. **Due:** 31st May 2015.

Site Inspection: Desk Based Discussion and Physical Inspection – 13TH Mar 2015

A brief inspection took place of the treatment process area, reception area and transfer station. This was preceded by discussions with MG about general business and site update, site accident management plan, containment infrastructure maintenance and the Closure Plan. Various aspects of these points related to accuracy of drawings and plans with regard to drainage, sumps and interceptors.

Tradebe Update

MG has partially restructured crucial elements of the management and supervisory waste treatment and engineering teams. A new operations manager has been appointed and new shift manager is being sent on chemistry related training. A Monday morning meeting is held with this new team. It is felt by MG that actions are better delivered and communication is smoother and more efficient with this new structure.

DCWW have a new local officer who liaises with site of the composition of the trade effluent. DCWW have had some issues

with certain limits. Where there is equivalent environmental protection (i.e. discharge to sewer and treatment at DCWW STW), the EPR permit may not have ELVs, as is the case with this permit, however BAT is the concept we apply. This has a bearing in that the permit is driven by what is considered BAT and not by the capacity of any receiving sewer.

New fire alarm system and CCTV have been installed – this is welcomed.

Filter press 1 has been overhauled and new components installed.

A water use audit by an external organisation has resulted in improved water use efficiency and further assessment is being made. Additional electricity consumption reductions have resulted from the changing of an old power incomer. These “tweaks” here and there all contribute to better environmental performance.

MG advised that additional CCTV work would be conducted to make sure the drainage plans are accurate. These plans should form part of the AMP – see below.

MG highlighted an issue with the hazardous waste producer registration reporting. A screen dump of a search on Tradebe brings up the words “Dummy Licence” before the site permitted details – this could be misinterpreted by interested parties considering using Tradebe, but being put off by these words – AK to look into.

Lastly Tradebe were given an award by the Royal Mint for their performance as a waste contractor for the Mint.

Accident Management

Permit conditions 1.2.1(a) & (b) cover provision, implementation and review of an accident management plan. AK reviewed Tradebe document: Emergency Preparedness & Response Plan PGHS 101 Issue 3, Feb 2014. MG supplied an updated version of Nov 2014. AK offers the following recommendations:

- Ensure sufficient credible scenarios are included, e.g. vandalism, power failure, equipment breakdown (e.g. scrubbers), off loading waste in wrong bay or treatment line.
- Describe provision for emergency storage, such as calamity tanks and how long emergency tankers (and what volume) would take to be deployed at the site.
- Interceptor, its design and capabilities and possible role as containment in an incident should be included. How it would be emptied and cleaned.
- Large scale plans, such as those in Appendices 3, 4, 5, 6 and 7, should be available in an incident response folder or placed on the walls of the incident control room.
- Drainage plans to be checked to ensure no foul cross connections to surface water drains and direction of flow marked.
- Pipelines should be labelled for contents and direction of flow along with tanks and sumps – is this the case? Refer to Improvement Programme IC2.
- Accident response sections could contain more specific detail, e.g. what techniques can be used to control runaway reactions or quenching of vessels, containing firewater run off etc.
- This plan should be cross referenced in other procedures, such as acceptance and waste storage procedures, e.g. PGRH 101 and 102.
- Any risk assessments should include risk to the wider population in the event of a major release and in deriving risk, consideration should be given to defining the severity element by means of combining severity with duration and extent of incident / release.
- All emission points should be marked on a plan – this could be the same plan as the drainage plan.

Maintenance and Inspection

Maintenance and inspection and recording of critical environmental kit, specifically primary, secondary and tertiary containment measures was also discussed. MG, by way of discussion with one of the Tradebe team, supplied a number of documents extracted from the computerised asset and maintenance system. These comprised individual Service and Maintenance Records sheets for a tank (plant item T10) and infrastructure (plant item B1) and an inspection register for tank T10.

These documents show that various pieces of kit are logged on the system individually, listing type of kit and associated specifications (materials of construction, volume, age and maintenance regime) – this is done on the Service and Maintenance Records sheets. A record of each items inspection and action / findings is then kept for each piece of kit.

Looking at the individual plant item records, tank T10 was installed around 1993, made of mild steel (glass coated) and has a capacity of 500m³. It has a maintenance intervention plan covering interventions on monthly, quarterly, 5 yearly and 7 yearly frequencies. The Tank Inspection Register for T10 shows that during 2014, nozzles were checked monthly, but going back over the years to 2009, only evidence of one tank emptying and desludging was recorded (Oct 2009). This is not in accordance with either best practice for this size treatment vessel or in line with Tradebe's own plant item instructions, which state: check air nozzles monthly, drain and desludge every 12 – 18 months, external inspection of support legs every 3 months, external inspection and thickness every 5 years, full internal inspection every 7 years.

Action 8 Tradebe 130315: Site to explain the disparity in the records and confirm if similar omissions and / or differences have occurred with other critical pieces of kit. **Due:** 31st May 2015.

Plant item B1 covers the main bund, which is stated as being made of cast concrete in 1995. The maintenance interventions require weekly visual inspections and an external contractor checking bund infrastructure bi-annually – is this correct – is this twice a year (bi-annually) or once every two years (biennially)?

Action 9 Tradebe 130315: Site to add more detail to this sheet and refer to Sector Guidance, which in turn refers the operator to more detailed guidance on concrete pollution prevention structures (e.g. CIRIA C736). Areas to include are pointers for inspecting staff (evidence at joints of corrosion / leaks / expansion / cracks), consideration of material of construction suitable for liquids bund may have to contain; volume calculations; evidence of fall to drainage sumps; details of proposed minor maintenance, such as filling in cracks or conducting patch repairs. **Due:** 31st May 2015.

Closure Plan

As per permit condition 2.7.3 the operator should review the site Closure Plan every 4 years. Guidance can be found in the Sector Guidance Note and How to Comply With Your Environmental Permit. Closure means returning the site to a satisfactory state (the baseline at permit application – see SPMP below) and covers potential groundwater and soil testing as well as preventing pollution during decommissioning and demolition. As much thought must go in to this aspect at the design stage as well as the decommissioning stage, so that underground structures are minimised in the first place and potential issues foreseen early on. The final GW / soil (SPMP) round of data should not be taken before full decommissioning (emptying and flushing of tanks and pipe runs) and demolition has finished. The Closure Plan must be updated and reflect changes on site.

Physical Inspection

A brief physical inspection took place.

Some areas of the main reception yard and associated roadways were significantly cracked and some joints between slabs need resealing.

Action 10 Tradebe 130315: Tradebe to confirm the details of any programmes of repair for the concrete surfacing, i.e. details of defects recorded and when they are likely to be repaired. **Due:** 31st May 2015.

Drainage plans etc. were discussed above under the Accident Management Plan. It was noted that the various plans may be incomplete in terms of ensuring all drainage routes, surface water lines and discharge points and all sumps, interceptors etc. are put on the various procedures and plans. AK noted that the sump in the external off loading / reception and holding area (draining whole yard to sump in treatment area building) needed to be put on the relevant drawing. Also the sump / interceptor outside the transfer station needs to be put on the PPM schedule and include details of capacity, age, materials of construction, inspection regime.

The process tanks and scrubber configuration was looked at. Labelling of IBCs in the process treatment queues was also looked at and the question asked that, as outside, would information be lost due to rain etc. – this was rebutted due to the ink used. Consideration of roofing the reception and treatment queues should be looked at regularly, with the added benefit of less rainwater to sewer via the treatment building sump and associated sewer charges cost and loss of secondary containment capacity issues considered.

The transfer station is segregated and improvements over recent years have led to larger capacity in each blind sump, with only the central sump ever likely to (although considered very unlikely due to off loading procedures) receive incompatible substance mixtures. This scenario is built into the site AMP and the interceptor can hold spills.

Action 11 Tradebe 130315: Site to confirm if transfer station interceptor is isolated, capable of being isolated (stop valve) or drains to the main sewer system. Capacity to be noted also – see comments about this sump being on the PPM schedule. **Due:**

Mentioned above under AMP already, one plan should be drawn up that shows all the drainage routes and listed discharge points in the permit: surface water discharges into the reën; sewer emission point; LEVs and boiler ; air emission points; sampling points, especially where not the final discharge point, e.g. SC2 and SC3 feeding to SC1; sumps and interceptors etc.

Treatment processes will form part of the ongoing compliance assessment plan, where the key principles of the treatment will be looked at (characterisation of waste; suitable treatment; process monitoring) along with a gauge on how efficient any process is (e.g. the degree of transfer of pollutants from incoming waste to effluent and emissions).

Other Discussion – SPMP, OPRA, Current Permitted Activities, Proposed Permit Variation

SPMP

The permit decision document confirms the operators assessment that the site will have little likelihood of pollution, due to a combination of concrete surfacing, sumps, indoor treatment processes and alluvial geology over a secondary aquifer.

However due to previous brown field use the operator decided to take several rounds of soil and groundwater data to define a baseline from which there should be no deterioration during the life of the permit.

The second aspect of the SPMP is the monitoring and maintenance of pollution prevention infrastructure, e.g. bunds etc. This was discussed above under maintenance.

The operator should refer to the most recent guidance on Site Condition Reports; found in EA guidance H5 Site Condition Report and EA Regulatory Guidance Note RGN9, which discusses the latest position influenced by IED and states that we wrote to operators (2007 /08) to state we would not continue enforcing permit conditions requiring the SPMP and review of the SPMP, as long as under the site EMS a life time records approach is followed, ref. to para A2 page 22 of RGN9.

Therefore you are no longer required to take annual groundwater samples or review the SPMP – your existing EMS and planned preventative maintenance, incident response and Closure Plan procedures should cover the same scope as an SPMP. You must however follow a lifetime records approach as outlined in Section 3 of RGN9 and throughout H5. When it comes to surrender these records will be assessed (maintenance regimes, incidents, clean ups, remediation etc.) along with possible surrender intrusive investigation data taken at the end of the site operations (see Closure Plan section above) – to compare with the site baseline in order to pass the no deterioration permit surrender test.

When IED leads to the issuing of revised BAT Conclusions, permits in each sector will be reviewed and it is likely that a minimum requirement of GW monitoring every 5 years and soil testing every ten years be varied into revised permits. The Waste Sector BRef is being reviewed now, however it is not known exactly when the conclusions document will be issued triggering permit reviews.

Action 12 Tradebe 130315: Site to (i) amend the current SPMP procedure to reference permit conditions: 2.8.1 and 2.8.2, instead of 4.1.7 and the revised situation as discussed above, i.e. a lifetime records approach; (ii) provide the borehole logs and analytical results from the annual rounds, with a view to forming a baseline report of soil and GW conditions beneath the site; (iii) confirm the nature of the membrane beneath the site and if any boreholes penetrate it. **Due:** 31st August 2015.

OPRA

In January 2014 AK sent an email to MG advising how to conduct the annual OPRA profile review. NRW is still using the EA OPRA scheme – the latest spreadsheet templates and guidance can be found on www.GOV.UK. The OPRA scheme links to the Charging Scheme – NRW have issued their own Charging Scheme after consultation for financial year 2015 / 16 – please refer to the relevant sections of both documents for guidance on the OPRA scheme, charging multipliers (x OPRA base score to derive subsistence, variations etc.), non compliance score values and compliance banding and how that influences the subsistence fee.

In Mar 2015 it was noticed that Tradebe had been using the Waste Facilities OPRA profile spreadsheet. AK explained the correct OPRA profile spreadsheet to use was the Installations spreadsheet, covering tabs for Complexity (what activity), Emissions (to all media including waste), Location and Operator Performance (which is divided into training, competence, management systems and enforcement history).

Current Permitted Activities & Proposed Permit Variation

During the March inspection AK asked what activities were being carried out presently at the site. The permit and variations list a number of storage, transfer and treatment activities. It appears that the transfer station and associated storage, bulking up and onward transfer is still carried out, along with the acid and alkaline waste treatment. The site also carry out treatment of cyanide bearing wastes with oxidation. The ammonia waste treatment (and the need for scrubber SC5) was never

commissioned and carried out. MG also advised that the former waste oil treatment process is not being carried out either. Associated storage, bulking and onward transfer of the treatment process wastes are still carried out.

When the site was permitted into the [then] IPPC regime, a residual element of a former waste management licence was left to enable the site to carry out certain activities on certain waste streams. Over the years various variations have refined the extent of the various Recovery and Disposal activities within the main Schedule 1 EPR listed treatment activities; waste code tables have been expanded and treatment vessel references have been amended.

In all it is believed that the permit now covers fully the various activities the site carry out, but that a variation is required, which will aim to:

- Consolidate the permit and variations (6 documents in all).
- Surrender the former residual WML – a separate process to the permit variation.
- Add additional waste codes – treatment to be assessed as BAT before waste codes added.
- Remove listed activities and associated R & D codes that are no longer carried out – oil and ammonia treatment?
- Within the Table of listed activities, the activities falling under Transfer operations and under Treatment operations, need to better reflect what activities are carried out where, in what vessels, but not so prescriptive as to unduly limit the site to using certain vessels only. NRW regulatory officer, NRW permitting and Tradebe to look at defining what activities take place where and what actual references go into the table under scope / limits of activities.
- The IED aspect of including GW and soil sampling at the minimum of 5 / 10 years respectively will be considered, but a separate variation may be required triggered by the issuing of the waste sector BAT Conclusions document.
- Inclusion of the proposed new treatment tank project.

MG has requested a meeting to conduct variation pre-application discussions. AK has forwarded availability and will consider inviting an NRW permitting officer. MG to advise of dates when a site meeting can take place.

Comments From June 2014

AK visited the site in June 2014 and much of what was discussed then has been reiterated above. Such points covered:

- Drainage CCTV surveys to be put on the PPM schedule.
- Jetting of sewer line conducted.
- Training and development of key staff.
- Weighbridge repaired.
- Clean out of tanks 21 and 22.
- Filter cake waste classification and appropriate landfill fate.
- Trial of filter cake used in making cement type blocks – AK advised MG look at NRW Trials Position guidance – as any use of waste is still covered by waste legislation and is not always straightforward.
- Chemical resistant pumps fitted for tanker offload.
- Noted: corrosion to floor of treatment building near the tanker bays.

END

1st May 2015



EPR Compliance Assessment Report

Report ID: SP3531SK/0241875

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

Site	Gwent Waste Management Centre NRW/EPR/SP3531SK/V007	Permit	SP3531SK
Operator/ Permit	Tradebe Gwent Limited	Date	13/03/2015

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

X

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
E1	C4	No action specified	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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. 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.