

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

Site	Gwent Waste Management Centre EPR/SP3531SK				Permit Ref	SP3531SK		
Operator/ Permit holder	Tradebe Gwent Limited							
Date	18/06/2015				Time in	10:00	Out	16:00
What parts of the permit were assessed	Follow up to Mar 2015 Inspection and actions, permit variation discussion May 2015 and Insp 18th June 2015							
Assessment	Procedure review	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	Mark Griffiths, Site Manager							
Officer's name	Andi Kemp				Date issued		18/06/2015	

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	N	
	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	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	A	
	4. Reporting & notification	N	
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	0	Total compliance score (see section 5 for scoring scheme)	0
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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.

Purpose of Compliance Assessment

Tradebe (Newport) Gwent Waste Management Centre was visited on 18th June 2015 by AK (NRW). In attendance from Tradebe was Mark Griffiths. The actions from the Mar 2015 inspection were discussed - these (except Action 12) had a deadline of 31st May 2015 and an update was required. A discussion about the proposed permit variation took place - an update on the 20th May permitting meeting between NRW and Tradebe and a site inspection also took place.

A summary of the action progress, extended actions and new actions can be found at the end of this CAR1 form.

Summary of Actions From March 2015

Action 1 Tradebe 130315 – DCWW take weekly samples and convert to ammonia – N. Permit requires unionised ammonia as N. MG to ask DCWW for the calculation and whether they can (or Tradebe chemists) turn the DCWW result into the form required by the permit. **Action 1 ongoing, due: 31st July 2015.**

Action 2 Tradebe 130315 – There seems to be conflict between what the permit requires (monitoring emissions to sewer on a batch basis, Table S4.3) and the reporting forms, which ask for the highest (or lowest) result. It is quite common for monitoring and reporting to be different. What needs to be clarified is the monitoring basis as the site is more or less a continuous process and so spot sampling rather than each batch is more appropriate. DCWW sample weekly and Tradebe submit the highest result, i.e. the highest result out of 12 samples – AK saw the raw data and MG gave AK a copy of Jan – Mar 2015 data. During the permit variation process consideration should be given to evaluating the sampling in line with BAT for this sector. An outcome could be to have a monthly spot sample, or a flow proportional composite sample (one per month) and each monthly result reported, i.e. 3 results in every quarterly submission. The other issue with the reporting is that one quarterly set of data will contain the highest result from the whole quarter and the various parameter results are not necessarily from the same DCWW weekly analysis – so multiplying flow by a concentration from the quarterly submission will give you the theoretical maximum and not the true loading of a particular parameter. A quarterly average may be more appropriate. **Action 2 closed on the basis of site to explore during the permit variation process.**

Action 3 Tradebe 130315 – An automatic pH reading and dosing system of the scrubbers is being put in, w/c 1st July 2015. MG to provide details and drawings – I would suggest this is included in the permit variation and the monitoring must be at least as per the method in Table S4.8, BS 6068 – 2.50: 1995 / ISO 10523: 1994 or more up to date method. It is the pH monitoring and associated pH values for SC1, SC2, SC3 that are permit conditions. AK will inspect and assess this in subsequent compliance work. **Action 3 closed.**

Action 4 Tradebe 130315 – MG acknowledged that the MCerts site conformity certificate has lapsed. The SIRA appointed management system audit of the flow measurement arrangements has not been carried out before the end of the previous SCC expiration date. The MCerts measurement of flow is a permit requirement (permit condition 3.6.3) – I attach the EA Performance Standard on Minimum Requirements for the Self-monitoring of Flow, v4 Aug 2014. This document outlines the scheme and potentially, once you have had the flow measurement arrangements inspected and had the initial Quality Management System audited successfully, subsequent QMS audit frequency can be discussed with SIRA or any accredited body that has flow arrangements in their UKAS accreditation. **This action is closed, but see the action below:**

Action 1(i) Tradebe 180615 – Tradebe Newport to arrange for the QMS of their flow monitoring arrangements to be audited and to ensure the previous flow arrangements inspection is still valid; **(ii)** Tradebe Newport to confirm and supply evidence that they meet the MCerts scheme requirements for self-monitoring of effluent flow. This may mean simply undergoing a successful QMS audit (see (i) above), to complement the existing validation of the flow measurement arrangements (+/- 8% uncertainty) and / or Tradebe to check that the previous MCerts inspection of the flow measurement arrangements is still valid. **Due: (i) 31st July 2015; (ii) 31st October 2015.**

Action 5 Tradebe 130315 – MG advised that Mike Foley will supply evidence on the waste classification and assessment procedure for the filter cake going to landfill. This evidence to be broad enough in scope to cover these aspects: waste sampling and assessment, waste classification (using WM2), satisfying the waste acceptance procedures (and WAC) of landfill operators. **Action 5 ongoing, due: 31st July 2015.**

AK will assess these procedures and site implementation of these in subsequent compliance assessment.

Action 6 Tradebe 130315 – MG provided evidence in the form of the hazardous waste returns and Tradebes internal tracking of outgoing hazardous waste movements. This showed every transaction of hazardous waste transferred off site to further recovery, treatment or disposal, either internally at other Tradebe permitted sites (e.g. Fawley incinerator), or to other external operators. The totals matched the totals submitted in the waste returns and annual report summaries. **Action 6 closed.**

Action 7 Tradebe 130315 – This relates to two previous EA audit campaigns: hazardous waste pre-acceptance and storage of containerised waste. A variety of documentary evidence between EA and Tradebe has been exchanged over the years and Tradebe have an actions tracking table. AK and MG are to book a site meeting and inspection to run through some of the actions to ensure recommendations and actions have been acted upon and completed. This will form part of ongoing compliance assessment work. **AK has booked Thursday 3rd September 2015 to do this on site in Newport. Action 7 closed.**

Action 8 Tradebe 130315 – It was noted during the previous inspection that one vessel hadn't been maintained and inspected as per Tradebes own internal maintenance regime schedule and standards. MG provided an update explaining that the corporate department of Tradebe are evaluating the maintenance and inspection regimes for their sites storage and treatment vessels – based on age of tank, materials of construction and duty required of the equipment. This is to ensure the equipment is up to standard and to define what interventions need to take place to maintain the vessels. Tradebe can then arrange for the appropriate contractors to be engaged and to provide clearer directions for activities staff can carry out (and when) on site. AK stressed that: *is what should be being done, being done and are records kept*. MG made reference to a tank emptying and desludging event that wasn't recorded on the maintenance record sheets. The action also required Tradebe to investigate whether other critical environmental kit (containment, impermeable structures, alarms, abatement equipment, monitoring equipment,

shut off valves, control panels etc.) is being maintained to the internal plans made by Tradebe.
Action 8 ongoing, due: 31st August 2015.

Action 9 Tradebe 130315 – To be extended and reassessed in subsequent compliance assessment. AK reiterates the need for the planned preventative maintenance regime for various pieces of pollution prevention equipment (in this case, specifically the concrete surfacing around the site acting as tertiary containment) to be detailed enough to direct staff clearly and unambiguously in how to inspect concrete surfacing, bunds, kerbing and sills, what to look for and when to intervene and make short term repairs or plan and cost longer term replacement.
Action 9 ongoing, due: 31st August 2015.

Action 10 Tradebe 130315 – See Action 9 above. Tradebe to assess the tertiary containment, including sumps and interceptor pits, with a view to designing a rolling programme of repairs where necessary. This programme should be able to be inspected by the regulator to see where the operator is with respect to issues identified and planned measures to rectify. Action 9 feeds into this item in that Action 9 requires inspection pointers for staff and Action 10 will be the maintenance and repair programme that falls out of the inspection regime. **Action 10 ongoing, due: 31st October 2015.**

Refer to EA guidance S5.06 pages and 72; CIRIA guidance C736 section 12 and Appendix A10.

Action 11 Tradebe 130315 – MG advised that the transfer station sump situated underground outside the transfer station does not have an outlet and is completely sealed. **This action is closed, but see the action below:**

Action 2(i) Tradebe 180615 – This sump is to be put on the PPM schedule; to have its own individual Service and Maintenance Records sheet and separate Inspection Register sheet – to show what the item is (materials of construction, volume, use, location, maintenance and inspection regime etc.) and when it was inspected. **(ii)** The drainage plans to be updated to show that this is a blind sump along with other drainage plan amendments outlined in the Mar 2015 CAR1 (accuracy, showing surface water discharge points, preventing misconnections). **Due: (i) 31st July 2015; (ii) 31st December 2015.**

Action 12 Tradebe 130315 – Due date for this action is 31st August 2015. The SPMP was discussed and the operator is clear on what to amend. This will be discussed during subsequent compliance assessment.

Permit Variation Update

AK and Kevin Ashcroft (NRW National Permitting Service) came to the site on 20th May 2015 to discuss the proposed permit variation – refer to CAR1 covering Mar 2015 inspection, which outlines the aims of the proposed variation.

What was confirmed or planned today was:

- Tradebe to prepare a draft variation application and send to AK and KA.
- AK and KA will plan a meeting with the operator to discuss this draft to ensure everything has been captured, including additional items:
 - Auto pH sampling and dosing of scrubber solutions.
 - Potential alterations to monitoring of emissions to sewer.
 - Amendments to drainage plans.
- KA to look at the surrender of the residual WML.
- NRW to signpost operator to application forms and guidance:
 - NRW website > Apply & buy > Application forms and guidance to Parts A, F and C.
 - Opra Scheme > Overview > Installations guidance > Installations spreadsheet

- NRW Charging Scheme
- Main guidance: EU Bat Reference Document for waste transfer, storage and treatment; EA Sector Guidance Note on waste treatment: S5.06; umbrella guidance: How to Comply With Your Environmental Permit.
- Additional horizontal guidance: H series (H1 impact assessment etc.); M series (e.g. M18 Monitoring Emissions to Surface Water and Sewer).

Inspection and Site Update: 18TH June 2015

MG accompanied AK around the treatment process, transfer station, surface water drainage points and container / waste storage area. AK has highlighted the treatment process as an area for future compliance assessment work.

See Action 2(i)(ii) Tradebe 180615 and Actions 9 and 10 Tradebe 130315 for comments on inspection, maintenance and repair of concrete tertiary containment structures. AK highlighted areas where concrete surfacing and associated kerbs had cracks and damaged seals between joints. Tradebe need to assess which areas need priority and this should be based on areas where joint seals are absent and cracks are potentially through the whole slab. The focus should be on ensuring areas providing protection in high risk areas are capable of preventing transmission of liquids to the soil, groundwater or surface water drains.

AK asked MG if the filter cake press room sump was emptied and inspected to ensure it is still capable of preventing pollution to soil and groundwater. AK also asked if any as built drawings showed how the sump was constructed and the depth of concrete around it. MG is looking into this.

There is some uncertainty about where the site surface water drains and roof water drainage actually discharges. The ditch along the site boundary was inspected and no drainage points were visible except the point where the reën emerges from a culvert. There is a current action on the site to confirm the drainage system and represent it on an amended drainage plan.

At the rear of the treatment building Tradebe store empty drums and IBCs and drums containing oil contaminated plastic packaging. The site need to ensure only empty, non leaking containers are stored in this area and that the area does not drain directly surface water. This is linked to the ongoing action about accurate drainage plans. A waste skip was leaking paint from the waste paint tins disposed within. Tradebe to discuss with their waste contractor the potential issue of paint leaking from the container as it is transported off site.

There was less waste in the reception area and the containers were labelled and stored in specific segregated rows in accordance with HSG71. These containers then either go into the treatment process queue or are moved to the appropriate bay in the transfer station. This reception area drains to the main treatment process sump and then ultimately to the sewer via one of the treatment process.

MG had previously alerted NRW to a radioactive substance dew point meter that arrived in a shipment of waste from the Royal Mint. Tradebe took the appropriate action and notified the waste producer and made arrangements with a specialised waste contractor. AK consulted with one of NRW's RSR officers to check on the activity of the source and it was confirmed that it is below the level for a single source and is exempt from EP Regulations (Schedule 23). This material is not controlled waste as defined by the UK legislation and so Duty of Care and / or Hazardous Waste consignment notes and controls do not apply. The waste producer asked Tradebe to produce a HWR consignment note – this is not necessary. There is documentation: Radioactive Material Transport Document, covering the transfer of the dew point meter from Tradebe to ACB in Maidstone. AK has spoken to the NRW regulatory officer covering the Royal Mint – they will discuss how this article ended up unintended at Tradebe.

There was nothing else to report from the walk around of the treatment process buildings.

Action Summary

Action 1 Tradebe 130315 extended to 31st July 2015

Action 2 Tradebe 130315 closed

Action 3 Tradebe 130315 closed

Action 4 closed – but see new Action 1(i)(ii) Tradebe 180615, due (i) 31st July 2015, (ii) 31st October 2015

Action 5 Tradebe 130315 extended to 31st July 2015

Action 6 Tradebe 130315 closed

Action 7 Tradebe 130315 closed

Action 8 Tradebe 130315 extended 31st August 2015

Action 9 Tradebe 130315 extended 31st August 2015

Action 10 Tradebe 130315 extended 31st October 2015

Action 11 closed – but see new Action 2(i)(ii) Tradebe 180615, due (i) 31st July 2015, (ii) 31st December 2015

Action 12 Tradebe 130315, not due until 31st August 2015

These actions above will be reviewed at the end of July and at the September meeting.

Next Compliance Assessment

A meeting has been booked for Thursday 3rd September 2015 – see Action 7 Tradebe 130315 re. pre acceptance and containerised waste storage. This will be conducted on site with MG at Tradebe Newport.

An assessment will need to be made of the new scrubber liquor dosing and monitoring of pH. This will be done at the end of July 2015. Waste filter cake assessment methodology to be assessed within the next three months. Waste treatment process efficiency to be assessed also this year.

END

	EPR Compliance Assessment Report	Report ID: SP3531SK/0253730
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This form will report compliance with your permit as determined by an NRW officer

Site	Gwent Waste Management Centre EPR/SP3531SK	Permit	SP3531SK
Operator/ Permit	Tradebe Gwent Limited	Date	18/06/2015

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

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.