

Compliance Assessment Report

Report ID:
CAR_NRW0023727

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				
Regime	Installations				
Date of assessment	29/06/2016	Time in	13:00	Out	16:00
Assessment type	Site Inspection				
Parts of the permit assessed	Follow up on two actions and transfer station inspection				
Lead officer's name	Kemp, Andi				
Accompanied by					
Recipient's name/position	Mark Griffiths/ Gwent Reginal Business Manager	Date issued	04/07/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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 Category	Condition(s) breached
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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 recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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

AK visited the site on Wed 29th June 2016 to follow up on the two remaining open actions from CAR1 June 2015, due 31st Mar 2016; to run through the scope of the forthcoming OMA audit scheduled for Aug 2016; to discuss ad hoc items such as: permit variation, treatment activities and business projects. A brief inspection took place around the waste reception and quarantine area and the transfer station.

MG and JC of Tradebe were present and one of the transfer station chemists were spoken to.

Outstanding Actions

From the June 2015 CAR1 two actions, both made up of two parts, remain open. They concern: (i) the MCerts inspections and the issuing of a site conformity certificate to illustrate that the effluent flow monitoring is in accordance with the permit and the MCerts scheme; (ii) the transfer station sump and overall site drainage plan.

In support of closing out action 1(i)(ii) June 2015, MG submitted the following by way of telephone conversation and emails of 7th Apr and 26th & 27th May 2016:

MCerts flow meter arrangements and uncertainty report from Emerson Process Management Ltd, inspector: Paul Cherry, reference 7601, 9th Dec 2015

Sira MCerts MS Audit reports, Graham Cutler, 24th May 2016

These reports have declared the flow meter and the quality management system as passing the MCerts Performance Standard for the minimum requirements of effluent flow. They recommend another QMS audit in 12 months as per the MCerts scheme. Minor recommendations were flagged in both reports and these have all been attended to, e.g. opening flow meter and photographing the evidence of no scale build up and creating an MCerts manual for staff. Tradebe also have to conduct internal audits of their MCerts arrangements.

Tradebe are now applying for their SCC and AK will check this during the Aug OMA. **Action 1(i)(ii) June 2015 now closed.**

In support of Action 2(i)(ii) June 2015, MG emailed the transfer station sump(s) infrastructure equipment list and maintenance inspections and an amended drainage plan.

The former shows what equipment is to be inspected and when and provides details of the specification of the sumps and their capacities and references CIRIA guidance. The latter shows evidence of when the sumps have been emptied and the results of the inspections – no defects relating to loss of integrity have been found.

The drainage plan has been embedded into the site document: PGHS101 issue 4, Emergency Preparedness

& Response Plan. The plan includes the emission points and the locations of the surface water discharge points, it clearly shows how the transfer station bay and central internal sumps drain to the main external transfer station sump and that the latter is blind, with no connections to the foul or surface water drainage. The plan is annotated and has date and version on it.

Action 2(i)(ii) June 2015 is now closed.

Tradebe have no open actions remaining.

OMA August 2016

AK ran through the scope of this audit. It will focus on effluent monitoring and the pH readings of the treatment scrubbers. There are no permitted releases to air. AK highlighted the critical elements of the OMA v4 scheme and emphasised how poor scores for these will undermine the whole monitoring efforts of the operator. AK had previously visited the site (Dec 2015) to check the emission points (see CAR1 Dec 2015) and OMA guidance and question sheets have been given to the operator. NRW now expects the operator to become familiar with the scheme and the evidence that will be required during the audit – this ideally should be assembled ahead of the audit.

Business Update

MG declared that the permit variation (picking up from discussions in May 2015, ref. to CAR1 Jun 2015) was now to be advanced. On top of items already flagged as needing attention, Cd needs to be put in the permit table as a parameter to effluent – Tradebe are also in discussions with DCWW about their TEC. Cd has been detected at below 1mg/l levels and is unlikely to affect the receiving STW.

The variation will aim, by way of consolidation and updating, to make it clearer the activities the site carry out and volumes, with accurate waste code tables.

MG discussed a proposal to re-route the sewer line from the treatment area, in above ground lines to two vacant holding tanks to the east side of the tanker off load bays. Capability to treat sludge to concentrate Ni, with a downstream recovery operation by a third party is being investigated and is also something that needs to be covered in a variation along with the proposed sewer line change. The overall emission point will be relocated, but the end point is still the DCWW foul main in Stephenson Street.

AK wants to clarify what treatment activities take place and their frequency, e.g. neutralisation, cyanide destruction, Ni concentrated in sludge / filter cake, oil treatment. A degree of flexibility needs to be in the permit so that all activities are covered, but the operating techniques and supporting work instructions / procedures allow the site to vary locations of certain treatment and toggling between different tanks, based on treatment demands and options. The operator will have to have clear management of change procedures to avoid cross contamination and / or adverse reactions when treatment options are moved between tanks. Compliance with the permit and DCWW TEC should not lapse due to these operating techniques. This needs to be built into the variation.

AK also suggested that in the annual report (p.c. 4.2.1) Tradebe briefly describe what treatment activities they have or have not been carrying out the previous year, e.g. *cyanide destruction approximately every two weeks, oil treatment not happening due to oil price etc.*

Inspection

A brief inspection was made of the quarantine and reception area and the transfer station. AK asked questions about the amount of waste in the reception area and around the procedures for assessing it as

it arrives, comparing to knowledge of the waste from enquiries with customer, compatibility and turnaround time. All the waste was labelled and in sealed containers that weren't leaking or damaged. The bulk of waste had been moved over in IBCs to the treatment operation queue. The remaining waste was mostly oils. The market has dropped out of using recovered waste oil somewhat due to crude oil world price decreases – i.e. less demand for recovered oil.

The transfer station also contained lots of oil containers. The transfer station is well designed and contained and allows for safe segregated storage. The bays are all labelled to receive only the appropriate wastes. The site follow amongst other guidance: HSE HSG71 Chemical Warehousing. This aspect of compliance is linked to work previously started (7th Sep 2015), but not yet fully written up, on pre-acceptance, acceptance and storage of containerised waste. AK stressed that after the OMA, this work will be concluded using recent Tradebe documents emailed to AK.

AK ran through the recent regulatory work calendar and its purpose. The first piece of work was covered in the Mar 2015 CAR1 and primarily concerned the site infrastructure and maintenance (tanks, pipes, bunds, sewers, sumps). Waste pre-acceptance, acceptance and storage followed in Sep 2015 – this will be concluded in 2016. This element also included how Tradebe analyse their filter cake and liaison with the landfill operator. Monitoring of emissions started with actions around ammonia reporting and requiring MCerts standard flow monitoring and will conclude with the Aug 2016 OMA. The final piece of work taking us to the end of compliance year 2016 / 17, will be an assessment against BAT of the treatment process and its suitability and efficiency for the waste streams imported. In the round this covers the main aspects of permit compliance and environmental protection.

END

EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Gwent Limited	Date	29/06/2016

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 reports 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 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. 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.