Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0033438

This form will report compliance with your permit as determined by an NRW officer					
Site	Bridgend Waste Management Centre	Permit Ref	GP3298FY		
Operator/Permit holder	Tradebe (Gwent) Ltd				
Regime	Waste Operations				
Date of assessment	10/05/2018	Time in	10:00	Out	13:00
Assessment type	Audit				
Parts of the permit assessed	Schedule D, E6 and C				
Lead officer's name	Thomas, Ffion				
Accompanied by					
Recipient's name/position	Mark Griffiths/ Area Manager	Date issued	31/05/2018		

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 Category	Condition(s) breached
A1 - Specified by permit	A	
C1 - General Management - Staff competency/training	X	
C2 - General Management - Management system and operating procedures	A	

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

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

This compliance Assessment Report (CAR) form has been completed following the planned audit of the Tradebe Gwent Limited permit EPR NP3233XX undertaken on 10th May 2018.

The audit was undertaken as part of the routine annual inspections and concentrated on the management systems related to plant and equipment maintenance programmes and staff training records.

Agenda:

Past CAR form action review (check on any outstanding matters)

Review of compliance with schedule D

Review of compliance with Schedule E6

Review of compliance with Schedule C

Discussion regarding Waste Treatment BREF (due to be published June 2018) and BAT Gap analysis.

AOB.

Present:

Ffion Thomas

Mark Griffiths

Julie Campbell

Andrew Price

Cameron MacCormac

Past CAR form action review.

There were no outstanding actions for Tradebe from previous CAR forms.

NRW action related to confirming the sewer emission limits was provided.

Improvement condition 1 of the NP3233XX permit related to sewer emissions has been signed off in previous CAR_NRW0031849.

Permitting service advice related to inclusion of the DCWW limits into the NRW permit have been received via email and forwarded. The detail is:

- NRW could remove the sewer limits in the permit as they have a trade effluent consent with DCWW, however NRW wouldn't initiate this work and a operator application would be required.
- The 2 permits, waste installation and waste facility, could be consolidated into 1 EPR permit but again NRW wouldn't initiate this
- The timescales for review will fall into the BREF programme, however work isn't due to begin on this for a while now so if the operator wants to sort the above issues they would need to submit a variation application. We can vary and consolidate at the same time

Variation application advice can be found via the following link:
http://naturalresources.wales/permits-and-permissions/waste/waste-permits/apply-to-vary-change-a-permit-for-waste-operations/?lang=en

Review of compliance with schedule D

EMS system review:

A review of NRW electronic file show no site environment management system ("working plan") for the site.

ACTION Tradebe: Please forward a copy of the sites EMS/Working Plan.

There are 2 management systems for Tradebe the company – currently older sites are held on an N drive whilst the newer sites have moved to a new internal cloud-based system. Both systems hold the sites procedures and audit records. A review visually showed that all environmental relevant procedures were on these systems. Internal audits are undertaken and reviewed by ISO to obtain the IO14001 and 9001 accreditations (see CAR NRW_0031849) Actions from internal audits are recorded onto the company's workbench system (see below for more information on this system)

Maintenance systems review:

A review of Tradebe's procedures and documents relevant to maintenance systems was undertaken. Andrew Price provided hard copy records and Julie Campbell displayed the company's internal system where applicable as evidence.

Tradebe operate an all business environment management system, within this is a "work bench" computer system where any infrastructure maintenance and health and safety issues are recorded and actioned.

A visual check was done of the sites hard copy Infrastructure inspection sheets. These are completed daily.

These checklists document the inspection of such items as the firefighting equipment and alarm system, the tank and bunds, drainage system along with amenity and security checks.

If issues are identified, as was the case the day before my inspection where a leaky pipe was found – then a "workbench" is recorded onto the electronic system.

During the audit evidence was shared of this incident and how the system works.

The report is entered onto the workbench, this then schedules a work request, which triggers the maintenance schedule and tracks all items with date and time stamps for auditing purposes.

The work bench also required report details of what occurred/went wrong. In the above instance a flange seal had degraded resulting in a leak on the pipe coupling, the degradation was believed to be due to age.

If required maintenance staff are deployed to site or arrangements made for parts to be delivered for site staff to undertake repairs, as was the case in this incident. Out of hours staff on standby or diversion of resource from within the company is possible along with contractors also available if needed.

The system will also then detail the auditing of the root cause to identify any learning and remedy any risk assessment updates needed.

Root cause actions are delegated to Julie for auditing and to ensure the assessment process is closed off.

If the issue is serious then it is escalated and goes to Mark Griffiths as area manager, and Mark will sign off all reports. (if the event is a RIDDOR reportable then the company CEO is also made aware)

Monthly reports are generated and discussed by the area managers, acting as a bench marking system and an auditing tool ensuring actions are closed off.

Review of compliance Schdeule E6

Condition states “The activities shall be managed and operated: by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.”

A review of the site operators training records was undertaken. Hard copy certificates were checked. The WAMITAB continued competence certification has elapsed.

Andrew Price has arranged to be booked onto the on-line training course run by Tradebe before then arranging to be signed up to the next assessment centre.

NRW confirmed via WAMITAB that the retest of continued competence is all that would be needed, even though out of certificate date. The primary certification would not need to be re-taken.

ACTION Tradebe: Confirmation of WAMITAB certification is to be forwarded. If the certification is not received or proof of course booking by 30 June a further compliance assessment will be undertaken and scored for non-compliance if not progressed/certification confirmed.

Other training certificates were inspected these showed a date of 2007 for the EMS implementation training and Hazardous waste classification. It suggests there is a gap in continued assessment.

To this point Mark Griffiths confirmed, and visually demonstrated via company intranet records, that a review of the businesses training matrix was underway.

The need for a review had been identified via an internal audit and improvements to the scheduling of training and maintenance of records was required.

I viewed the proposed new matrix whilst Mark Griffith provided a verbal explanation. The matrix will be sub divided to role requirements and locations making it easier for staff to check what their training needs are and schedule training to achieve their required competence.

Mark Griffiths envisaged that the new matrix would be completed within the next 4 months.

A review of this training matrix will be undertaken at the next site visit.

Review of compliance with condition Schedule C

Both electronic documents and hard copies of the management system are maintained and were made available during this audit. Some records required need updating but as detailed above this action is already underway.

Site inspection:

A brief inspection was undertaken of the site. Over all housekeeping is of a high standard. A new main water tank has been installed with a non-return valve.

The plant is beginning to show some signs of aging with a few repairs to pipe work and possible rush patches showing on the tanks.

A report of tank integrity was last forwarded 8/5/15 however it is suggested that the tank maintenance schedule is reviewed, and confirmation of any repairs e.g. rust patches undertaken have been completed/signed off.

AOB:

A reminder was given that the waste treatment BREF will shortly be published. Information can be found via http://eippcb.jrc.ec.europa.eu/reference/wt.html

Julie Campbell confirmed Tradebe were already working on this and had begun to assess their BAT gaps.

Julie has since shared a spreadsheet of Tradebe internal assessments and this work is acknowledged as demonstrating the company's good performance. This BAT gap work will be

reviewed following the Reg 60 notices and permit review work.

Site waste returns and emission monitoring submissions have also been assessed and no non-compliances identified.

END.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0033438**

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Operator/Permit holder	Tradebe (Gwent) Ltd	Date	10/05/2018

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.

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			
C1	X	Confirmation of WAMITAB certification is to be forwarded by 30 June	30/06/2018

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. 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.