

## Compliance Assessment Report CAR\_NRW0039271

**Permit being assessed:** NP3233XX.

For: Bridgend Waste Management Centre, held by Tradebe Gwent Limited

At: Factory Lane, Pencoed, BRIDGEND, CF35 5BQ.

**Type of assessment carried out:** Report/Data Review, Reason: Routine.

On 31/12/2021.

Parts of permit assessed: Monitoring Returns

**NRW Lead Officer:** Geraint Harris.

**Report sent to:** Alex Morris, Site Manager on 03/02/2022.

### 1. Summary of our findings (full details in section 4)

| Part of permitted activity assessed (criteria)                                                   | Assessment result | Permit condition |
|--------------------------------------------------------------------------------------------------|-------------------|------------------|
| E4 - Emissions - Sewer                                                                           | Assessed (A)      |                  |
| E5 - Emissions - Waste                                                                           | Assessed (A)      |                  |
| H1 - Resource Efficiency - Efficient use of raw materials                                        | Assessed (A)      |                  |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment | Assessed (A)      |                  |
| H2 - Resource Efficiency - Energy efficiency                                                     | Assessed (A)      |                  |

Result types are explained in more detail in the 'Important Information' section below.

| Total number of non-compliances recorded | Total non-compliance score |
|------------------------------------------|----------------------------|
| 0                                        | 0                          |

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

No action required.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

## 4. Details of our assessment

**Tradebe (Bridgend) Ltd****EPR/NP3233XX**

The annual performance report for 2021 was received by NRW.

**Energy:**

Tradebe Bridgend were asked, in a previous CAR Form, "How does the energy consumption in 2021 compare to previous years? Do you have any plans to reduce your consumption going forward? Due date 3rd December 2021."

Tradebe responded with the following: The predicted energy consumption for 2021, when looking at the run rate YTD, will be around 27600 KWH, this is in line with the average for the last 4 years; which has been calculated at 27650 KWH.

With regards to the second question Tradebe responded with the following "A review of energy consumption was undertaken, namely electricity usage, at the site. A contractor was commissioned to review the sites potential for installation of solar panels. The mentioned report is currently being reviewed internally. All fluorescent tubes have either been replaced, or are scheduled to be replaced, with energy efficient LED lights."

**Water Usage:**

Water usage, unable to monitor as this is supplied unmetered to site direct from Dŵr Cymru.

**Raw Materials:**

The site purchases two different raw materials which are used as treatment reagents: ferric chloride solution, for both pH adjustment and grey water treatment in the DAF plant, and a polyelectrolyte to aid with clarification.

Polyelectrolyte usage is minimal, with 1 x 1000 litre IBC lasting the site in excess of 12 months.

With regards to Ferric Chloride Tradebe used 12.018 tonnes of ferric chloride in 2020 to treat 29544 tonnes of waste. This resulted in a specific usage of 0.00041 tonnes of ferric chloride per tonnage of waste. In 2021 Tradebe used 11.760 tonnes of Ferric Chloride to treat 23520 tonnes of waste. This resulted in a specific usage of 0.0005 tonnes of ferric chloride per tonnage of waste. Therefore, there was a 21% increase in the specific usage of ferric chloride in 2021. However, since the quality of the waste can vary from batch to batch it is difficult to relate these figures to process efficiency.

**Effluent Discharge:**

The effluent discharge monitoring and management systems achieved MCerts recertification 22nd March 2021, with renewal required March 2026. The flow meters are included in Tradebe's PPM system and undergo external verification annually.

**Sewer:**

Sewer discharge monitoring for the period July to December 2021 was received. No non-compliances were found.

**Waste Returns for Oct-Dec 2021:**

Waste in =13537.01

Waste out = 25.0

No non-compliances found.

**End.**

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

| Assessment result | Description                                                       |
|-------------------|-------------------------------------------------------------------|
| Assessed (A)      | Assessed or assessed in part, no evidence of non-compliance found |
| Action only (X)   | Action only relating to the activity assessment                   |
| Ongoing (O)       | Ongoing non-compliance, not scored                                |

| Non-compliance category    | Description                                                                                                                 | Score |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------|
| C1 Major                   | Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property | 60    |
| C2 Significant             | Potential to have a significant impact or effect on the environment, people and/or property                                 | 31    |
| C3 Minor                   | Potential to have a minor or minimal impact or effect on the environment, people and/or property                            | 4     |
| C4 No environmental impact | Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property       | 0.1   |

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**What are suspended scores?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry and Waste action criteria (used in section 1 and 2):****A: Permitted activities**

- A1 Specified by permit

**B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

**C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

**D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

**E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

**F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

**G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

**H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

## Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

## Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

## Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

## What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

## Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.