

Compliance Assessment Report CAR_NRW0039340

Permit being assessed: SP3531SK.

For: Gwent Waste Management Centre NRW/EPR/SP3531SK/V007, held by Tradebe Gwent Limited

At: Gwent Waste Management Centre Corporation Road, Corporation Road, Newport, NP19 4RD.

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

On 28/01/2022.

Parts of permit assessed: 4.2.2 Annual Reports 2021; 4.2.3 Emissions to Sewer

NRW Lead Officer: Rebecca Green.

Report sent to: Alex Morris, Site Manager on 15/02/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	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

Forms S1, Emissions to Sewer, 1st October to 31st December 2021 and SC1, Scrubber Operation, 1st July to 31st December 2021, were received on 10th February 2022. Forms WaterUsage1 2021 and PI1, Performance Indicators, 2021 were received on 28th January 2022. Form Energy1 2021 and other amended reports were received on 10th February 2022. All the reports are accepted.

S1, Emissions to Sewer, 1st October to 31st December 2021

There are no emission limit values (ELV) in the permit for emissions to sewer.

SC1, Scrubber Operation, 1st July to 31st December 2021

pH values for SC1, SC2 and SC3 are all within their respective ELVs.

From 17th August 2022, Tradebe will no longer be required to report this process monitoring data to Natural Resources Wales (NRW), see Schedule 3b, Table 3.4. The data should be recorded and available on site for inspection by NRW.

Energy1, Energy Usage 2021

Total overall energy use was less than in 2020 and more than 30% less per tonne of accepted waste (ptaw). Electricity consumption ptaw was about 30% less, mainly because a high demand fan was not operating for two months. In the future this fan will be turned off out of hours to reduce electricity consumption.

Gas consumption was slightly less ptaw. Oil consumption was similar to that in 2020 but more than 10% less ptaw.

Water1, Water Usage 2021

Total water consumption decreased and use ptaw also fell by more than 30%.

PI1, Performance Indicators 2021

Total annual production/waste accepted was about 10% higher than in 2020.

The total amounts of hazardous and non-hazardous waste accepted were higher than in 2020. Non-hazardous waste ptaw was similar to that in 2020 and hazardous waste was almost 15% higher ptaw. Slightly more non-hazardous waste was sent to landfill, both total and ptaw. Significantly less hazardous waste was sent to landfill, more than eight times less ptaw than in 2020. This was because of the product mix accepted during 2021.

Discharges to sewer were higher in 2021, increasing by more than 40% ptaw. The discharges to sewer in 2020 were unrepresentative because some treated waste had to be tankered off site due to a blocked sewer. The total volume discharged in 2021 is lower than in 2019 but 10% higher ptaw.

Performance Report 2021

Tradebe underwent an MCERTS audit in July 2021. The meter is verified and serviced annually. The weighbridge was calibrated in October 2021.

Waste accepted continues to be low in solids, resulting in lower tonnages of filtercake. The ratio is similar to that in 2020. There was a significant reduction in the amount of hazardous filtercake sent to landfill, again due to the mix of waste accepted.

The large reduction in water usage is mainly due to the installation of the tanker washing facility and its associated water recovery unit.

The bund walls encircling the site have been repaired and the expansion joints replaced. The floor in the acid off-loading area has been repaired and an acid- resistant screed laid.

The ETP project is currently on hold until the position on BREF implementation across the devolved nations is clear. Tradebe are continuing with their trials.

This has been another difficult year for industry. Amounts of waste have recovered a little but are not back to 2018/9 levels yet. The reductions in energy use and water consumption are encouraging and should be maintained in 2022.

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 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

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.