	EPR Compliance Assessment Report	Report ID: WP3836ZF/0243739			
This form will report compliance with your permit as determined by an NRW officer					
Site	Wrexham Clinical Waste Treatment Facility (Incinerator)		Permit Ref	WP3836ZF	
Operator/ Permit holder	SITA Healthcare Limited				
Date	30/06/2015	Time in	13:00	Out	17:10
What parts of the permit were assessed	Abatement plant and progress with monitoring/reporting				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Paul Phillips/Acting Plant Manager				
Officer's name	Lara Cubley	Date issued	14/07/2015		

Section 1 - Compliance Assessment Summary					
<p>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.</p>					
Permit Conditions and Compliance Summary				Condition(s) breached	
a) Permitted activities	1. Specified by permit	N			
b) Infrastructure	1. Engineering for prevention & control of pollution	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	N			
	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	A			
	5. Deposits on road	A			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A			
	2. Records of activity, site diary, journal & events	N			
	3. Maintenance records	N			
	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.

This meeting and site inspection was aimed at discussing progress with some of the issues previously highlighted at the site and to inspect the carbon abatement system, bag house pressure differential recording, and observe ABC steam leak repair.

Due to the closure of one of the Operator's other sites there is likely to be an increased dependence upon the Wrexham Plant from mid-July.

Dates are to be agreed for a major audit to encompass EMS, Planned Preventative Maintenance, and Waste Acceptance in September 2015. This will be followed up with a further meeting and inspection at the end of the year.

Performance Indicators

The Operator is to re-submit corrected Performance Indicators to include waste accepted for the year 2013/14 as required by the permit.

Carbon data requested by Information Notice

The Operator confirmed that despite the delivery of the 11/11/14 not being included in the data supplied in response to the information notice, there was such a delivery. The data provided by the Operator was that directly from the carbon supplier with the above delivery date omitted in error. The Operator confirmed that each bag contains 500kg of carbon reagent and it is delivered in 2 tonne consignments. **The Operator is to review, correct, and re-submit this carbon data.**

Given that the amounts of carbon & lime used are paramount to flue gas treatment and accurate reporting is required by the Permit, the Operator is to ensure accurate monitoring. **The Operator has been developing a procedure for such monitoring, which is to be submitted to NRW on completion.**

Management of Monitoring & Reporting

The Operator is working on his procedures for the management of monitoring and reporting at the site. Some discussion was had regarding definitions of abnormal operations, invalid results, and reporting of data. **The Operator is to provide NRW with finalised procedures.**

The Operator asked for advice on whether both TOC and CO CEM being out of service would be classed as an abnormal operation, or whether you could continue with either or. The Operator has also asked for advice regarding the half hourly CO ELV of 100mg/m³ which had reportedly previously been 150mg/m³. A query was also raised on the periodic hourly average ELV for particulate matter. **NRW will advise on this.**

It was agreed for ease of operation that half hourly averages with less than 20 minutes data

could be invalid where waste feed commences between programmed on hour and half hour increments.

The Operator is to confirm that the CEM software interface is using all data available to make up half hourly averages and not just 20minutes.

Bag House

The Operator reported that the light powder test passed but all bags where replaced. The lab report suggested a further 12 months life remained. A gauge has been installed to measure the pressure differential over the filters, however, this is not easily accessible up a ladder, and was not inspected. The Operator reported problems with electronic interface. **The Operator is to submit proposals for implementing this with timescales to NRW by 11/09/15.**

Carbon delivery system

The improvements to the carbon delivery system were inspected. The Operator is currently interrupting the carbon dosing on a weekly basis to validate the amount being dosed. Whilst the system does recycle reagent, the Operator was advised that this must be a temporary measure whilst a more accurate method of measurement is awaited. This will be covered in the BAT review due by the end of the week.


The new motor on the carbon delivery system had an issue with the cooling unit being broken despite being new. This is reportedly not currently effecting the performance and will be replaced shortly.

Inspection & Other Issues

The ABC steam leak had been repaired.

Fugitive emissions from the kiln did not appear to be a problem. The Operator reports that occupational health monitoring is conducted and passes requirements.

Paul Phillips is currently the contact for this site but a Senior Plant Manager has been appointed and should start in August, at which point he will be the main point of contact.

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Operator/ Permit	SITA Healthcare Limited	Date 30/06/2015

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

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.