	EPR Compliance Assessment Report	Report ID: WP3836ZF/0229544			
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	03/12/2014	Time in	09:00	Out	16:45
What parts of the permit were assessed	WID Compliance & Management of Monitoring and Procedures QAL 3				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Steve Blay & Toby Hudson/Tradebe Environment				
Officer's name	Lara Cubley, Stuart Ross		Date issued	30/01/2015	

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	N			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	N			
	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	A			
	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	C3		2.10.1	
	2. Records of activity, site diary, journal & events	N			
	3. Maintenance records	A			
	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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.

The audit was aimed at assessing compliance with WID, (which has now been subsumed into the IED) and management of monitoring, (in particular with continuous emission monitoring standard BS EN 14181 for QAL 3). Progress with other ongoing issues at the site were discussed.

The site has just had an early shut down but was back up and running again following start up at approximately 7pm 29th November 2014. The next planned shutdown is in February 2015.

WID/IED Compliance

Temperature is measured by three thermocouples (top, middle and bottom) near the inner wall. These are clearly displayed with an average of the three checked for compliance. Temperature traces were viewed and found to be in compliance with the >1000 degrees Celsius requirement. The site generally operates at this high temperature.

Waste feed is limited by process interlock with the bin feed, however, this is set to the 850 degrees Celsius limit when the process operates over the 1000 degrees Celsius requirement most of the time. An afterburner comes on should gases fall below 1000 degrees Celsius.

All returns on Bottom Ash demonstrate compliance with the <3%TOC.

The hours of abnormal operation are being logged by the Environment Manager and there was awareness of the 4hr and 60hr annual limit.

BS EN 14181 for QAL 3

Calibration gases were checked during the site inspection and all were found to be in date. However, it was reported that that between May and September 2014 there was no calibration gas available for HCl. On review of HCl span gas QAL3 control chart provided by the Operator no data is plotted March to October 2014 inclusive. This was reportedly due to the contents of the canister having been lost due to the valve not properly closed. The Operator reported supplier problems with lead in times to obtain HCl span gas. Condition 2.10.1 requires the Operator to monitor for the above parameters using a CEM which meets the requirements of the methods stated and MCERTS as per note 8 in Table 2.2.2. QAL3s are a part of MCERTS methods and are important to ensure the validity of data produced by the CEMs. **G1 Monitoring of Emissions and the environment CCS = 3. The Operator is to ensure he has appropriate stock control in place for span gases and supplier arrangements to enable compliance with MCERTS QAL3 arrangements with immediate effect.**

QAL 3s are conducted during maintenance by the CEM maintenance contractor. The Operator

also conducts weekly span and zero checks. The control charts are plotted automatically by the software and were viewed in the control room. Some of the charts looked as if they had plots outside of the set alarm limits. The Operative reported that if they appear to fail they are conducted again the following week at which point if they continue to fail the CEM maintenance contractor is called out. The Operator was requested to send the control charts to us to allow for more thorough review following the audit.

The Operator supplied screen shots of the QAL3 Shewhart charts by CD. The charts covered the period June 2013 – December 2014 and appear to show the difference between the readings and expected value of the reference material.

The SAMS values on the control charts provided appear to be different to those in the service contractor's service reports (22/07/14 & 25/09/14). **The Operator should investigate this and report back.**

For SO₂ there only appear to be a maximum of 3 points plotted on the zero and span control charts in this period. **The Operator must confirm why this is. There are also a number of points outside the alarm limit which would indicate CEMs drift. The Operator must confirm action taken for all these instances.**

For VOC the span chart indicates over 8 consecutive points on the lower side of the mean from May to August 2014 inclusive. **The Operator must confirm action taken for this instance.**

There appear to be no span data plotted on the control chart for November & December 2014. We assume this is linked to low pressure detected by service contractor. **The Operator must confirm action taken and whether this has been resolved.**

The VOC zero chart shows consecutive readings being of the upper side of the mean for over a year. **The Operator must confirm action taken.**

For CO the span chart appears to have omitted QAL3s or they are not plotted for September & October 2014. There also appear to be points outside the alarm limit. Points are also outside the alarm limit in December 2014 on the zero control chart. **The Operator must confirm why data is missing and action taken for alarm instances.**

For HCl the span chart shows 8 months of missing data which was confirmed by the Operator due to the loss of span gas and difficulties in procurement. Some zero checks for HCl were plotted in this period but some were over the alarm limit. Service contractor reports suggest solenoid valve problems, further confirmed to be incorrectly connected gases. Problems were also encountered with QAL3 settlings being incorrect. **The Operator must confirm that guidance and standards for replacing gas bottles have been adhered to with respect to QAL3 span control charts. Evidence to this effect must be provided.**

For Oxygen span and control charts show recent points outside alarm limits for November & December 2014. This and recent VOC problems could be connected to issues identified in service contractor reports of MILEX filter on span port missing and contamination of solenoid block. **The Operator is to confirm action taken and provide evidence that QAL3 control charts are in compliance.**

The Operator must provide information above requested to demonstrate that QAL3 requirements are being fully and consistently met by the 02/03/15.

He is also advised to ensure that requirements for MCERTS compliance are written into management systems, including thresholds for defined actions, clear apportionment of responsibilities and appropriate training of staff. A meeting will be arranged to discuss this.

Other Issues Noted from Site Inspection

Notable fugitive emissions were noted from the rotating kiln seal. This was brought to the attention of management if only from a health & safety concern. Management pointed out that all occupational health monitoring conducted was within the required limits.

The boiler re-circulation fan was noted as being particularly noisy (out of balance?). This was pointed out to site management.

It was agreed that both issues would be further investigated and acted upon as necessary by site management.

Current Site Manager leaves at the end of the week. Interim arrangements involve Assistant Plant Manager as nominated contact, together with continued support from SHEQ department until a new manager is appointed.

Progress with ongoing issues

Mercury

Jerome – The Operator is to confirm the technical range of this instrument to ensure that it is suitable for the monitoring requirements.

The Operator must provide an update to confirm progress on all Filtration Medics actions.


Further review of wastes accepted has not pointed to any potential sources of mercury. As such we are likely to require more frequent monitoring to give further re-assurance that this was an isolated event. The Operator is advised to think about this and put a plan together for submission.

CEMS & MCERTS Compliance

Operator requested a review of the CCS2 Score against sub criteria G1.

All QAL2s have now passed and the operator must seek formal approval for the x=y calibration function. This is also the case for deviation/departure from monitoring methods for particulates due to the very low concentrations.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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Operator/ Permit	SITA Healthcare Limited	Date	03/12/2014

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.			
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.			X
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			
G1	C3	Ensure span gas availability with immediate effect. Provide further information required in Section 2 of the report.	02/03/15

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.