	EPR Compliance Assessment Report		Report ID: WP3836ZF/0215258	
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	18/07/2014	Time in	10:00	Out 12:10
What parts of the permit were assessed	EMS, Mercury breach, Monitoring, and Waste Acceptance			
Assessment	Site Inspection	EPR Activity	Installation X	Waste Op Water Discharge
Recipient's name/position	Alan Gartside / Senior Plant Manager			
Officer's name	Lara Cubley	Date issued	23/07/2014	

Section 1 - Compliance Assessment Summary

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.

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	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	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	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	C3	5.1.1.1
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.

A site meeting was held to discuss ongoing development of the EMS given company changes, a recent mercury ELV breach (22/04/14) and monitoring. An initial look at waste acceptance was also on the agenda with a view to further auditing later this year. A trial on acceptance of oily rags was also discussed.

EMS

Many Tradebe corporate procedures have or are being adopted but the installation is still in a transitional phase with all to be on the same IT system by the end of the year. Conversely, many of the procedures being followed relating to the day to day running of the site are SITA procedures. The ISO 14001 certification body is to audit Wrexham in October for extension of the certification.

Mercury Breach

The breach of the ELV for mercury on 22/04/14 were a concentration of 0.158mg/m³ was obtained in the bi-annual periodic monitoring was reviewed. The Operator reported that on re-testing on the 30th June 2014 a result of 35mg/m³ was obtained. Such breaches with respect to Permit compliance will be recorded in the data review compliance assessment report to follow shortly. **The Operator must provide the full monitoring report of the monitoring undertaken on the 30th June to Natural Resources Wales.**

This concentration of Mercury is of great cause for concern and the Operator is required to act swiftly to investigate and bring such emissions below the ELV as required by the permit. **In particular the Operator must:**

Investigate wastes being incinerated at the time of testing and inform customers of problems encountered. The Operator is to supply this information to Natural Resources Wales together with documentary evidence of contact with customers.

Review abatement for Mercury.

Conduct further real time monitoring with the Jermome instrument to give re-assurance that emissions of Mercury are under control and help identify problematic waste sources.

Review APC residue analysis for any trends in Mercury.

A report detailing further such investigations shall be submitted to Natural Resources Wales by the 5th August 2014.

The Operator is also reminded of the requirement to notify all emission breaches without delay as required by Condition 5.1.1.1 of the Permit. This includes any repeat analysis other than that schedules as usual. **G4 CCS 3.** This is to be followed up with the Part A documentation required by the Permit under Condition 5.1.2.1 and further Part B information required by Condition 5.1.2.2. An updated Part B is acceptable on completion of the investigation to cover both Mercury breaches. **The Operator must provide the full monitoring report of the monitoring undertaken on the 30th June to Natural Resources Wales.**

Monitoring

The Operator reports that the QAL2 conducted in April 2014 showed that Particulates and HCl passed. However, as the concentrations of particulates are low it was suggested by the Operator's contractor that less tests are conducted over a longer duration. **The Operator must provide the full monitoring reports detailing these QAL2 tests to NRW. We can then advise on the acceptability of any proposals for monitoring.**

The Operator is to ensure all actions summarised in the Report, Review of QAL2 and AST Reports 24 April 2014, are completed.

The Operator is also requested to provide documentation to show the Oxygen linearity checks conducted prior to Easter to Natural Resources Wales.

Oily rags trial

Natural Resources Wales have reviewed further data on receiving EWC 15 01 10 wastes from the trial between the 7th and 9th March 2014. As there does not appear to be any adverse affect on emissions continuing to accept such wastes is deemed acceptable provided the feed rates do not exceed those used in the trial. The Operator reported that a further trial was completed without problems.


Variation

The Operator has put most documents together as required for the variation submission to change the incinerator to hazardous waste and accept a wider range of EWCs. However, there are still some plant checks to undertake prior to submission.

Waste Acceptance

The Operator is to provide up-to-date procedures currently adopted for waste acceptance and pre-acceptance at the site. It was agreed that both SITA and Tradebe procedures will be provided for review prior to audit later this year.

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	18/07/2014

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
<p>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.</p>			
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			
G4	C3	Ensure future ELV breaches are always notified without delay.	N/A

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.

