



This form will report compliance with your permit as determined by an NRW officer

Site	Wrexham Clinical Waste Incinerator			Permit Ref	MP3239FQ		
Operator/ Permit holder	SITA UK Limited						
Date	22/01/2014			Time in	09:30	Out	15:10
What parts of the permit were assessed	EMS, Accident Management, Environmentally Critical Plant and Maintenance, Non-Conformance and Corrective Action						
Assessment	Audit	EPR Activity:	Installation	X	Waste Op		Water Discharge
Recipient's name/position	Alan Gartside/ Senior Plant Manager						
Officer's name	Lara Cubley			Date issued		05/02/2014	

### 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	A	
	2. Management system & operating procedures	C3	1.3
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
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	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	N	
	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

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.

### Environmental Management System (EMS)

The site currently falls within Sita's accreditation to ISO 14001. However, it is partly shifting to Tradebe's environmental management system. This made it difficult to audit and it is proposed to conduct further auditing of the management system on completion of this exercise. The Sita SHEQ system's policy was available, however, objectives, targets, and actions appear to have fallen by the wayside. These should be progressed in the short term.

An organogram for the site was provided, however, roles and responsibilities with regard to environment could not be supplied. **The Operator is requested to check on this and report back with details.** This is a requirement of ISO 14001, should be available, and is important for effective management.

### Accident Management

The Emergency and Incident Response Plan dated 20/05/09, last reviewed 21/01/14, was provided. This covers common procedures in response to incidents at this type of site apart from fire. A fire risk assessment (created and last modified 05/02/12) and safe working procedure (30/01/13), together with R1 Fire log file containing a Fire Action Plan cover the eventuality of fire. However, this is lacking. The risk from and management of fire water run-off is not addressed. It is understood that there is a penstock control valve at the point where surface water run-off leaves the site. This is checked regularly, however, the lowering of the penstock to contain firewater run-off is not incorporated into procedures. The Operator must ensure such a control measure is included in procedures and that staff are trained and aware.

On review of Permit requirements (Conditions 1.3 & 2.8) and documentation back at the office. It would appear that an Accident Management Plan was received from the site on 21 March 2012. There are a number of documents dealing with accident management planning and response and it is recommended that these be consolidated and it be made clear which are the current versions to work to.

### Maintenance

A hard copy of the programme of maintenance was available for the site. Essentially this is a wall planner split into weekly, monthly, and quarterly requirements. Maintenance records are mostly held as hard copies with some contractor's reports held electronically.

Maintenance regimes for CEMs, bag house, HDU scrubber and biobeds, kiln charging system, and penstock were discussed with the Maintenance Supervisor.

Maintenance on the bag house is conducted monthly and all bags were reportedly changed in the last shutdown following particulate emissions in exceedance of permit limit. They were last changed December 2011. Some filters had been breached. Reportedly, filters may have been damaged by moisture in the system. We await findings of investigation (Part B).

Some maintenance checks were demonstrated and the records of maintenance checked were of

a high standard.

Steam was being emitted from the boiler. This was reportedly serviced during the last shut down. There was no reason for this valve being left open and it was agreed that it would be closed.

### **Non-Conformance and Corrective Action**

Managing Non-Conformance, Corrective and Preventative Action Procedure, dated 26/07/11 was made available. Not all non-compliances are being entered onto the COMPAS system as some are being entered onto the Tradebe system. It is believed that the particulate emission breach on the 14 November 2013 will be recorded and investigated via the Tradebe system.

The Part B for this is imminent. Permit Breach for this will be recorded on separate Compliance Assessment Report on receipt of Part B.

The proposition of operating between two management systems poses an increased risk to the business. That said, the interim position is understood. The Operator is advised that such a risk requires careful management and that the quicker the situation is made clear with which systems are being worked to the better. The situation is likely to be clear by the end of April 2014.

### **Compliance**

C2 Management Systems and Operating Procedures (Condition 1.3) - CCS = 3 Minor - See Accident Management section above and ensure shortcomings are addressed.

Please also see EMS and Non-Conformance and Corrective Action comments and recommendations above to ensure the following as soon as practicable:

- It is clear which EMS is adopted.
- Roles and responsibilities are clear and available.
- Objectives and targets are set and achievement monitored.
- It is clear which procedures and systems are being adopted.
- The above is communicated and training is provided.

This will be the subject of future audits.

*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.*



## EPR Compliance Assessment Report

Report ID: MP3239FQ/0199297

**This form will report compliance with your permit as determined by an NRW officer**

Site	Wrexham Clinical Waste Incinerator	Permit	MP3239FQ
Operator/ Permit	SITA UK Limited	Date	22/01/2014

### 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			
C2	C3	Address fire water risk (see text Section 2) by 28/02/14. Address EMS and procedural issues by 30/05/14.	see actions

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.

