

Compliance Assessment Report

Report ID:
CAR_NRW0026986

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	Tradebe Healthcare National Limited					
Regime	Installations					
Date of assessment	18/01/2017	Time in	10:00	Out	15:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by						
Recipient's name/position	Toby Hudson/ SHEQ Manager	Date issued	24/02/2017			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - Infrastructure - Management system and operating procedures	C3	1.3.1
C4 - Infrastructure - Storage, handling labelling and Segregation	A	
E5 - Infrastructure - Waste	A	
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
F5 - Infrastructure - Deposits on road	A	
H2 - Infrastructure - Energy efficiency	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

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 Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

An inspection of Tradebe Wrexham was carried out by NRW Industry Regulation Officer Matthew Kelk on 18 January 2017.

The following issues were discussed:-

New Carbon Dosing System

The new carbon dosing system is progressing well. Some delay in the project due to designating the plant as an ATEX zone, meaning that electricals have to be upgraded to different standard on the new system. Quotes have been given and it is expected that the new dosing system will be installed in April 2017.

The new system will be a dual system that doses lime and carbon at the same time to the reactor chamber. Storage of lime will be brought indoors.

Action

Site to provide an action plan for installation of the new carbon dosing system by 24 March 2017

Current Carbon Dosing System

A selection of 2 hourly operator logs were provided during the inspection which include a check of the carbon dosing system and the amount of carbon being added to the abatement system. There were several times that was noted on the forms that the operator was too 'busy' to perform the checks.

Condition 1.3.1

Without prejudice to the other conditions of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and condition of this Permit.

Procedure THC 119 - Incinerator Carbon Dosing was provided during the inspection. This provides instruction that the carbon dosing should be checked every 2 hours. In addition to this on the 12 January 2017 the carbon level was allowed to drop to only 1kg left in the dosing hopper.

Procedure not followed on occasions when operator noted on form that they were too 'busy'. Breach of condition 1.3.1, scored one category three score.

The online maintenance schedule was shown for the carbon dosing system, this indicated that the system was checked once a week. Records were provided during the inspection of these maintenance checks.

Adequate resources should be allocated to allow checks on the carbon dosing system to be carried out.

Action

Refresher training should be undertaken to stress the importance of the carbon dosing checks as specified under Tradebe procedure THC 119. Please inform NRW when this training has been undertaken.

Bin Designation Project

The bin designation project was started by a previous manager on site. Proposals are to have painted bays on the external yard to allow better organisation of the yellow bins on site.

Action

Please provide an action plan for completion of the project by 24 March 2017.

Steam Turbine

£1/4 million pound investment being made on site for the energy project. A Helie Power steam turbine is to be installed onsite, this will provide 200kw of power to the plant. This is a closed loop system and no steam will be released from this. Whilst no direct

emissions are to be released from the system consideration should be given to noise and vibration from the new plant.

Action

Provide an assessment of the noise and vibration that the plant will emit, to ensure the noise and vibration levels from the plant are not significantly increased by 24 March 2017.

Waste

Main waste streams from the incinerations process were discussed:-

Bottom Ash goes to Hafod Landfill under EWC Code 19 01 12, waste transfer notes provided during inspection.

Action

As discussed please provide waste classification for bottom ash by 24 March 2017.

APCr waste from abatement plant goes to incineration plant in Fawley, under EWC codes 19 01 07, transfer notes provided during inspection.

Floc from HDU unit goes to Hafod Landfill under EWC code 19 02 03.

Offensive Wastes also go to Hafod Landfill under EWC code 18 01 04.

Reporting and Complaints Procedures

Site ran through the complaints and incident reporting procedures used by Tradebe - no issues noted.

Queries Regarding Permit

There are some queries from site regarding several permit conditions (2.1.3 & 20mg/m³ ELV for Particulate Matter (Bi annual monitoring)) , discussions are ongoing whether these conditions can be varied.

Carbon Monoxide (CO) as Surrogate for Volatile Organic Compounds (VOC) Monitoring

On the rare occasion when the VOC CEMS (and associated equipment) are not operating correctly, waste is ceased loading to the incinerator.

Site have asked whether CO monitoring can be used as a surrogate measure for VOC destruction so that waste can be still loaded whilst the VOC CEM's are under maintenance. NRW agree in principle to this monitoring methodology but Tradebe will need to write to NRW officially to request this change and will need to provide evidence that there is a direct correlation between VOC destruction and CO at the plant.

EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Healthcare National Limited	Date	18/01/2017

Section 3 – Enforcement Response

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.

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C2	C3	Ensure staff are suitable trained to follow this procedure.	24/03/2017

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 verbally or 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 that 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 fulfil 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 (eg. 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 its service
- Freedom of Information Act/Environmental 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 fifteen 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.