

## Compliance Assessment Report

Report ID:  
CAR\_NRW0031774

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	01/06/2017	Time in	10:00	Out	13:30	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Briscoe, Ross					
Recipient's name/position	Toby Hudson/ SHEQ Manager	Date issued	30/06/2017			

### 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	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
E1 - Emissions - Air	A	
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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 was undertaken of the permitted facility on the 1 June 2017 by Industry Regulation Officer Matthew Kelk and Senior Environment Officer (Waste) Ross Briscoe.

The following issues were discussed as outlined below:-

### **Carbon Dosing System**

All orders have been placed for the new dosing system, the projected plan is to have the system fitted by October 2017. The kit is the same as specified in email to NRW 28 October 2016.

#### **Action**

Site to provide timescales for installation of the new carbon dosing system by 31 July 2017

### **Current Carbon Dosing System**

Logs were provided for 2 hour checks on the carbon dosing system, some entries showed marginally below the 5-6kg as specified by the procedure for the system. Site commented that the bag plant would be already coated and that the average carbon would equal at 5-6kg for every 2 hour period.

### **Refresher Training**

Refresher training has been carried out on all shifts with regards to the operational procedure for the current carbon dosing system. A selection of training logs were shown for this training.

### **Maintenance**

Computerised system shown and records provided by operator for the maintenance of the carbon dosing system

### **Waste Hierarchy**

At present bottom ash from the installation is sent to Hafod Landfill for disposal. The site has a duty under the Waste (England and Wales) Regulation 2011 to apply the waste hierarchy to this waste stream. As disposal to landfill represents the lowest option on the waste hierarchy, site should consider whether other avenues are available for reuse or recycling of the bottom ash. Waste Hierarchy Guidance is available from the Welsh Government Website at the following link below:-

<http://gov.wales/docs/desh/publications/120119wastehierarchyguideen.pdf>

#### **Action**

It was agreed during the inspection that site are to look further into the waste hierarchy options for bottom ash. Site to provide a report into this by 31 August 2017.

### **Steam Turbine system**

An update was given on the steam turbine system, site are to meter the steam produced on site so that engineers can design the optimum system for the site.

It was also discussed that heat recovery could be included as a BAT conclusion under the EU BREF document review for the Incineration of Waste. Since visiting site the draft document has been published by the IPPC bureau which Tradebe are being

consulted on. The draft BAT conclusions do include a requirement to recover energy from the incineration of waste (draft BAT conclusion 20).

### **Continuous Emissions Monitors (CEMS)**

New CEMS system is being installed, replacing the current system which is 12 years old. The site are moving from an analogue system to one which is digital, this should be installed by the end of 2017.

It has been previously discussed that when VOC FID monitor malfunctions the site has to cease loading waste, it has been discussed whether carbon monoxide monitor can be used to as a surrogate measure for VOC destruction and the incinerator will then be able to continue operating whilst the VOC monitor is being fixed. For NRW to agree with this surrogate method, Tradebe will need to officially request this in a letter and provide demonstration that there is a direct link between CO concentration and VOC destruction.

#### **Action**

Site to provide report into demonstration of CO concentration and VOC destruction and request to NRW formally to use this surrogate measure.

### **Emergency Vent Operation**

Emergency vent operation has reduced significantly since 2016, discussions were held over the reasons for recent emergency vent operation. 3 recent ones have been from power surges/drops from the national grid. Site are to fit capacitors to the system to try and combat this situation. When lime is delivered to the site silo via pressurised air, the excess air from the silo is vented to the plant baghouse. This can cause cold ingress into the system and can cause the thermocouples to trigger an emergency vent release. Site manager is now able to operate the incinerator during the delivery of lime so that the ERV is not lifted from this issue.

#### **Action**

It is recommended that all staff are trained and an appropriate operational procedure is written to ensure that the ERV is not lifted during lime delivery.

### **TOC>3%**

Site were asked what the procedure was if Total Organic Content (TOC) was greater than >3% in the bottom ash. NRW were informed that this scenario was very unlikely. There are monthly checks on the TOC content and data is trended. If over TOC content limit material would be fed back in.

### **SO2 and Pre-acceptance**

Discussions were held around waste acceptance and the control of SO2. The site now has a comprehensive CCTV system on the loading hopper, enabling the identification of foreign material to be kept well under control. A certain number of loads are checked during the day for foreign materials.

### **Hard-standing deterioration**

Site were asked about deterioration of hard standing in the external areas of the site. There is an action by site to replace concrete and site have had quotes for replacement. This will be carried out in the summer months.

### **Waste Feed Interlocks**

Discussions were held around what temperature the incinerator is held at and the interlocks for non charge of waste. The burners are set at 1000c well above 850c required by IED. It is not known how the interlocks are changed for the incineration of Cyclotoxic and Cyclostatic drugs and wastes containing greater than 1% halogenated hydrocarbons at 1100C.

#### **Action**

Site to confirm how interlocks are changed for wastes that need to be incinerated at 1100C under IED by 31 July 2017.

### **Security**

Drugs are stored on site for incineration, it was noted that the doors were propped open to allow air flow within the building in hot weather. It was mentioned that site should be aware of the security of these drugs with open access to the site when these door are open.

### Action

Site to review security arrangements for the storage of drugs by 31 July 2017.

### **Document retention**

Site asked about document retention for NRW records.

We are able to advise the following that all records required by the permit should be retained for a minimum of 4 years (see condition 3.1.6)

With regards to waste documentation, see table below:-

The type of waste site you have determines how long you keep records.

<b>Your waste site</b>	<b>Type of record</b>	<b>How long you must keep it</b>
Landfill (disposal codes D1 to D6 and D12)	All records	As long as you have a permit
Other waste site with a permit	Consignment notes	5 years
Other waste site with a permit	Site inventory and all other records	As long as you have a permit
Waste sites with an exemption	All records	3 years

## EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Healthcare National Limited	Date	01/06/2017

### 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.

### 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			

## 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](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.

#### Welsh Language

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