

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0026382**

**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	19/08/2016	Time in	09:30	Out	13:00	
Assessment type	Audit					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Ellis, Rhys					
Recipient's name/position	Toby Hudson/ SHEQ Manager	Date issued	22/11/2016			

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	
B5 - Infrastructure - Plant and equipment	C3	2.3.5
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E1 - Emissions - Air	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F4 - Amenity - Pests/birds and scavengers	A	
F5 - Amenity - Deposits on road	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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.

<b>Number of breaches recorded</b>	<b>1</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>4</b>
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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 carried out by Natural Resources Wales (NRW) Industry Regulation Officers Matthew Kelk and Rhys Ellis on the 19 August 2016.

The following issues were discussed whilst on site as outlined below:-

### 1. Waste Acceptance

Due to previous sulphur dioxide permit breaches, Tradebe (Wrexham) were asked to review their waste acceptance criteria. The reviewed waste acceptance documentation was provided during the inspection. The key change has been better guidance on acceptance.

#### Recommendation

Recommendations were made during the inspection to amalgamate the waste rejection procedure with the waste acceptance procedure for ease of use.

Site were asked what would happen if non conforming waste arrived on site and whether a quarantine area was set up for such wastes. Discussions were held around this and such incidences are very rare and with space at a premium on site bins would be taped as non conforming.

### 2. Carbon Dosing

Following recommendation at the previous inspection, the current dosing system has been covered to avoid moisture ingress and carbon binding in the system

#### Condition 2.3.5

*All plant and equipment used in operating the Permitted Installation, the failure of which could lead to an adverse impact on the environment, shall be maintained in good operating condition.*

Records were provided of recent carbon dosing. Dose rates were still below 5-6kg per 2 hours as specified on the form.

NRW expressed concern that dioxins/metals are still not being adequately abated by the carbon dosing system due to low dosing rates.

Breach of permit condition 2.3.5 - scored one category 3 score.

The new site manager Vince Norris ran through plans to install a new dosing hopper containing much larger activated carbon bags. This would contain a load scale and a screw conveyor which would be set to dose the correct amount.

Record sheets for dosing are not easy to follow and it is not clear how much carbon has been used after a bag has been added.

#### Action

Tradebe to compile an action plan for the new carbon dosing system and forward to NRW by 27 October 2016.

Tradebe to update dosing records to make it clearer to the reader how much carbon has been used. Sheet to be reviewed by 27 October 2016.

### 3. Lime Dosing

Tradebe were asked how the lime dosing system operates. Lime is dosed from the silo by computer depending on acid gas emissions levels indicated by the CEMs.

### 4. Continuous Emissions Monitor (CEMs)

Since the last inspection the CEMs system has been updated to include an audible alarm which sounds if the pollutant concentration reaches a trigger levels set by Tradebe. These internally set trigger levels were discussed during the meeting and

are well below emission limit values set within the permit.

#### Recommendation

Site to display information for operators on what to do if CEM's alarms next to the scada system on the incinerator.

#### 5. Noise

On the 7 September 2016 Industry Regulation team officers had been carrying out night time noise monitoring at a neighbouring permitted site. During the monitoring it was identified that a 'fog horn' type sound could be heard coming from Tradebe. Following discussion with Toby Hudson it was thought that this noise may be the system used to clear any blockages in the lime dosing system. Further complaint received of noise coming from 'air intake vents' on 21 September 2016.

#### Action

Tradebe have indicated that they will investigate the source of the noise and what measures can be carried out to mitigate this noise migrating off site. Investigation to be sent to NRW by 27 October 2016.

#### 6. Emissions Monitoring Data

Review of continuous emissions monitoring data for Q2 (May - July 2016) - all pollutants measured by CEMS for this period within permitted emission limit values for the site.

Periodic extractive monitoring data for the period Q1 and Q2 (Jan - July 2016) - no breaches of permitted ELV's

#### 7. Bottom Ash Composition

TOC data reviewed for Q2 2016 - burn out quality below 3% limit.

## EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Healthcare National Limited	Date	19/08/2016

### 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			
B5	C3	Send action plan for new carbon dosing system.	27/10/2016

## 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 reports 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 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.