

## Compliance Assessment Report

Report ID:  
CAR\_NRW0022680

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	14/06/2016	Time in	10:00	Out	13:40	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Wright, Paul					
Recipient's name/position	Toby Hudson/ SHE Manager	Date issued	14/02/2017			

### 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
B5 - Infrastructure - Plant and equipment	C3	2.3.5
C2 - Infrastructure - Management system and operating procedures	A	
C3 - Infrastructure - Materials acceptance	A	
C4 - Infrastructure - Storage, handling labelling and Segregation	A	
E1 - Infrastructure - Air	A	
F1 - Infrastructure - Odour	A	
F3 - Infrastructure - Dust/fibres/particulates and litter	A	
F4 - Infrastructure - Pests/birds and scavengers	A	
F5 - Infrastructure - Deposits on road	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

This CAR form has been reissued to the operator on 14 February 2017 due to issues raised from the original CAR form issued to site on 5 July 2016.

An inspection was carried out by Natural Resources Wales (NRW) officers Matthew Kelk and Paul Wright.

The following issues were discussed:-

### Carbon Dosing

#### 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.

Tradebe dose exhaust gases with carbon to ensure that the installation comply with their emission limit values for Metals and Dioxins.

Carbon dosing records were reviewed during the inspection, this details the weight of carbon dosed to the abatement system every 2 hours. The records specify that the dosing rate should be 5-6kg of carbon every 2 hours. Whilst reviewing the data it became apparent that there were multiple times when less than 5-6kg was dosed. This was evident in further records provided post inspection. One instance on the 6 June 2016 between 2am - 6am showed that only 0.2 kg of carbon had been dosed to the system.

Following review of these results NRW have serious concerns that metal and dioxins releases to air from the facility are not been adequately abated due to incorrect carbon dosing.

NRW require that a review is carried out of the site's carbon dosing procedure to ensure that the adequate dosing rate is applied and to ensure that actions are taken if inadequate dosing is occurring. Review to be carried out by 5th August 2016

Breach of permit condition 2.3.5 - you have been scored one category 3 score for this non compliance.

It was discussed that the carbon dosing system has a low level alarm fitted, it would be useful if the system could alarm if <5-6kg are dosed to the system. Tradebe are look at other incinerator sites to see how they carbon dose.

There were additional concerns during the site walkover that due to the partial open nature of the carbon abatement system that the carbon could absorb water and that could cause a blockage in the system. Tradebe to investigate enclosing the system further.

### Sulphur Dioxide Breaches

Sulphur dioxide emission breaches from 22nd and 23rd January were discussed. The short lived breaches of the emission limit breaches for SO<sub>2</sub> was due to non conforming waste. It was previously requested that the sites waste acceptance criteria was submitted 17 June 2016 (CAR\_NRW0019577). NRW were informed that the review was underway and would be completed imminently. Tradebe to complete review and send a summary to NRW by 5 August 2016

### Bin Designation

Bin designation was a previous concern expressed by NRW. This is an ongoing project by Tradebe, with new barriers, road and pedestrian walkway and pig pens for bins to be installed.

### Shift logs

Shift logs were looked at during the inspection. As discussed at previous inspections the second page of the shift log does not contain a date, so could be lost if seperated. All pages of the shift log should be dated.

#### Continuous Monitor Display

The display for the CEMS on the main exhaust stack was reviewed during the investigation, there was no evidence that checks had been carried out on the CEMS during the shift to ensure that the emission concentrations were below permitted ELV's. This was investigated during the inspection and Tradebe are to install alarms are the CEM's. In the interim period prior to the installation of the alarms it is recommended that checks on the CEMS are documented.

#### Emergency Vent Operation

At the time of the inspection the emergency vent has been operated 8 times in 2016.

The reasons for operation were discussed:-

Power surge/Power cuts - Tradebe to initiate investigation with power company as to reasons for this.

ID fan trips - parts of this system are to be overhauled and will help reduce the amount of trips of the ID fan, this is to be overhauled in the summer shutdown.

#### Breach of Carbon Monoxide (CO) Emission Limit Value (ELV)

On the 14 June 2016, NRW were notified of 3 CO ELV breaches of 1002.39, 161.8 and 1512.46 (14 June 18:00 - 19:30), no breach of permit as spikes were due to operation of the emergency vent.

## EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Healthcare National Limited	Date	14/06/2016

### 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	Review of carbon dosing procedure	05/08/2016

## 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 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.