

## Compliance Assessment Report

Report ID:  
CAR\_NRW0032947

**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	01/02/2018	Time in	10:00	Out	14:00	
Assessment type	Site Inspection					
Parts of the permit assessed	All					
Lead officer's name	Kelk, Matthew					
Accompanied by	Ross, Stuart					
Recipient's name/position	Vince Norris/ Site Manager	Date issued	05/03/2018			

### 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	C3	2.2.4.1
C2 - General Management - Management system and operating procedures	C3	1.3.1
<b>KEY:</b> See Section 5 for breach categories, suspended scores will be indicated as such. <b>A</b> = Assessed or assessed in part (no evidence of non-compliance), <b>X</b> = Action only, <b>O</b> = Ongoing non-compliance, not scored.		

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	8
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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 on site on 1 February 2018 by Industry Regulatory Officers Matthew Kelk and Stuart Ross.

The following was discussed during the inspection:-

### **1. Invalid Monitoring Data**

Shutdown of the plant has been included as "invalid" data on the CEMS quarterly monitoring. Invalid data should only be reported for periods of CEMS maintenance. It was discussed that this was a mistake by Tradebe and that the monitoring procedure is to be reviewed.

#### **Action**

Tradebe to review monitoring procedure and to include CEMS printout on days when shutdown occurs or not enough half hour/ten minute averages are available to calculate the daily average.

### **2. Abnormal Operation Procedure**

The abnormal operation procedure was reviewed and appeared fit for purpose. It was advised that the abnormal operation procedure link to the notification procedure.

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### **3. Carbon Dosing System Procedure**

#### *Condition 1.3.1*

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

The new carbon dosing system was fitted in November 2017. 7 day tote bags are now filled with carbon and provide a more reliable feed of carbon to the abatement system. The procedure for the new carbon system was shown and trained to staff in December 2018.

Carbon abatement system checks by staff are not always being carried out as per procedure provided by Tradebe.

#### **Action**

To retrain operatives involved in the importance of checks on the abatement system. Forward list of training logs to NRW by 5 April 2018.

Breach of condition 1.3.1, scored one category 3 score.

### **4. Shutdown Procedure**

Review of the procedure for shutdown was carried out, waste is burnt out at adequate temperatures to ensure complete combustion, this appeared fit for purpose.

### **5. Steam Turbine**

Meter is currently on site measuring rate of steam production for the future installation of a small steam turbine. Discussions were held whether this may change the site from a D code to R code. This is under review and can be confirmed upon installation of the

turbine.

## **6. Fugitive Emissions to Air**

### *Condition 2.2.4.1*

*The Operator shall use BAT so as to prevent or where that is not practicable to reduce fugitive emissions of substances to air from the Permitted Installation in particular from:-*

*storage areas,*

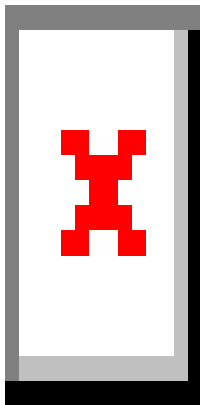
*buildings,*

*pipes, valves and other transfer systems,*

*open surfaces,*

*Provided always that the techniques used by the Operator shall be no less effective than those described in the Application, where relevant.*

Evidence of fugitive emissions of smoke leaving hopper after loading (see picture below). Unabated emissions are then leaving via vent in top side of building.



### **Action**

Tradebe to compile an action plan with remedial actions and dates as to minimising fugitive air emissions from furnace via the loading hopper. To forward to NRW by 5 April 2018

## **7. Quarter 4 Monitoring Review**

Review for monitoring data received for Q4 2017 (October - December 2017), assessed data submitted for PM, VOC, HCL, CO, SOx and NOx. All data show no breaches of permit limits, however we do have the following queries to make regarding the data submitted for December 2017:-

There appears to be no data for carbon monoxide on 10 and 16 December 2018 and no daily averages for 2,3,7,10,14,16,19,20 and 23 December 2017.

### **Action**

Please provide an explanation into the above query relating to CO by 5 April 2018.

#### **8. Bi-Annual Monitoring**

Monitoring assessed for periodic monitoring from stack A1, noted that all emissions are below permitted ELV's.

#### **9. Annual Returns**

Annual data analysed for Energy, Water usage, performance indicators and waste disposal - no issues with submitted data.

#### **10. Ash Composition**

Ash composition - data provided, Q4 2018 ash below 3% TOC limit.

## EPR Compliance Assessment Report

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Operator/Permit holder	Tradebe Healthcare National Limited	Date	01/02/2018

### 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			
B1	C3	See text for details.	05/04/2018
C2	C3	See text for details.	05/04/2018

## 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.