

This form will report compliance with your permit as determined by an NRW officer

Site	Wrexham Clinical Waste (Incinerator) EPR/WP3836ZF	Permit Ref	WP3836ZF
Operator/ Permit holder	Tradebe Healthcare National Limited		
Date	25/11/2015	Time in	Out
What parts of the permit were assessed	Monitoring returns review January - June (inclusive) 2015		
Assessment	Report/data review	EPR Activity:	Installation: X Waste Op: Water Discharge:
Recipient's name/position	Steve York/Paul Phillips - Assistant Plant Manager		
Officer's name	Lara Cubley	Date issued	25/11/2015

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

Permit Condition	Compliance	Condition(s) breached
a) Permitted activities	1. Specified by permit	N
b) Infrastructure	1. Engineering for prevention & control of pollution	N
	2. Closure & decommissioning	N
	3. Site drainage engineering (clean & foul)	N
	4. Containment of stored materials	N
	5. Plant and equipment	N
c) General management	1. Staff competency/ training	C3
	2. Management system & operating procedures	N
	3. Materials acceptance	N
	4. Storage handling, labelling, segregation	N
d) Incident management	1. Site security	N
	2. Accident, emergency & incident planning	N
e) Emissions	1. Air	C3
	2. Land & Groundwater	N
	3. Surface water	N
	4. Sewer	N
	5. Waste	N
f) Amenity	1. Odour	N
	2. Noise	N
	3. Dust/fibres/particulates	N
	4. Pests, birds & scavengers	N
	5. Deposits on road	N
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N
	2. Records of activity, site diary, journal & events	N
	3. Maintenance records	N
	4. Reporting & notification	C4
h) Resource efficiency	1. Efficient use of raw materials	N
	2. Energy	N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	5	Total compliance score (see section 5 for scoring scheme)	12.2
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Monitoring Returns 1st Jan to 30th June 2015

Monthly CEM data for A1

All monthly CEM data provided. On occasions this has not met Permit condition 4.1.2.4 to report within 28 days of the end of the reporting period. (i.e. February's data received 07/04/15, March's data received 01/05/15, April's data received 24/06/15, May's data received 28/07/15, June's data received 12/08/15. **Permit Breach G4 – Reporting & Notification CCS = 4 (X2) for quarter Jan – Mar & Apr – June 2015. The Operator must ensure monitoring returns are submitted in-time.**

There were no breaches of ELV recorded by the CEM for this period. The following issues were noted with the data:

- CEM data for 30/03/15 and 31/03/15 appears to show 0 as average. Given data this appears to be an incorrect average. **The Operator must investigate, report findings and confirm correct data to Natural Resources Wales by 18/12/15.**
- On 02/03/15 a maximum 10 minute average concentration of CO of 789mg/m³ was reported, which exceeds the 150mg/m³ ELV. However, the monthly report stated there were 0 exceedances of the limit. The daily average for the day is reported as within the limit. **The Operator must investigate, report findings and confirm correct data to Natural Resources Wales by 18/12/15.**

A1 Bi-annual Periodic sampling

- 13/03/15 Mercury concentration of 0.15mg/m³ was obtained in periodic extractive monitoring against an ELV of 0.05mg/m³. Part A received 08/04/15 and Part B 29/04/15. **(Permit Breach CCS = 3 Emissions Air E1 recorded for quarter Jan – Mar 2015 inclusive above).**
- 08/04/15 & 09/04/15 Mercury concentration of 0.28mg/m³ was obtained in bi-annual periodic monitoring against an ELV of 0.05mg/m³. Particulate concentration of 24.1mg/m³ was obtained against an ELV of 20mg/m³ and Dioxin concentration of 0.615ng/m³ was obtained against an ELV of 0.1ng/m³. Part A received 15/05/15 and Part B 04/06/15.

- 02/06/15 Mercury concentration of 0.07mg/m³ was obtained in periodic extractive monitoring against an ELV of 0.05mg/m³. Part A/B received 22/07/15. (**Permit Breach CCS = 3 Emissions Air E1 recorded for quarter Apr – June 2015 inclusive above**).

As per previous Compliance Assessment Report the Operator shall provide NRW with design proposals for carbon abatement delivery system for approval by 27/11/15. The Operator is reminded of his commitment to have a loss in weight system operational by 30/09/15 with further upgrades being implemented by early 2016. The Operator must demonstrate a return to Permit compliance as soon as practicable. We will now consider what enforcement action is appropriate and notify you, referencing this form.

Bottom Ash & APC residues

Monthly Bottom Ash submitted in accordance with Permit requirements and shows <3% TOC. Bottom Ash and APC residue composition data received.

Notifications

The following abnormal emissions were notified as per Permit Condition 5.1.1.1 during this 6 month period:

- 08/03/15 Notification of breach of CO 10 minute average received 09/03/15, which turned out not to be a breach of Permit emission limits.

The following Abnormal Operations were notified as per Permit Condition 5.1.1.5 during this 6 month period:

- 27/03/15 07:40 for 30 minutes due to ID fan belt failure. A Particulate concentration of 71.84mg/m³ (half hourly average) was reported (received 27/03/15). This exceeds the half hourly Permitted ELV of 30mg/m³. The Permit allows an emission limit of 150mg/m³ for Particulates during Abnormal Operations. However, the Operator has not ever reported an ID fan failure as an Abnormal Operation previously (see such notifications below). **Breach of Condition 1.3.1 which requires the Operator to implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit. Such management systems are not being implemented consistently apparent by the deviation in reporting. The Operator is to review procedures for reporting to ensure they enable compliance with the Permit and ensure all staff are conversant with them by 31/12/15. C1 General Management - Staff competency/training CCS = 3. In respect of this non-compliance you have been issued with a warning.**

The following emergency relief vent operations were notified as per Permit Condition 5.1.1.6 during this 6 month period:

- 06/01/15 23:15 for 60 minutes due to power surge to ID fan, loading ceased (received 07/0/15).
- 18/01/15 04:10 for 2190 minutes due to ID fan belt failure and damage to support bar, loading ceased (received 20/01/15).
- 08/03/15 for 10 minutes due to power surge to ID fan, loading ceased (received 09/03/15).
- 09/03/15 20:22 for 10 minutes due to faulty sender unit on boiler, loading ceased (received 10/03/15).
- 27/03/15 07:35 for 240 minutes due to ID fan belt failure, loading ceased (received 27/03/15)
- 23/04/15 22:00 for 185 minutes due to ID fan belt failure (received 27/04/15).

	EPR Compliance Assessment Report	Report ID: WP3836ZF/0253136
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Site	Wrexham Clinical Waste (Incinerator) EPR/WP3836ZF	Permit	WP3836ZF
Operator/ Permit	SITA Healthcare Limited	Date	25/11/2015

Section 3- Enforcement Response **Only one of the boxes below should be ticked**

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.	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
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.	X
We will now consider what enforcement action is appropriate and notify you, referencing this form.	X

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C1	C3	The Operator is to review procedures for reporting to ensure they enable compliance with the Permit and ensure all staff are conversant with them. See main body of text.	31/12/15
E1	C3	Provide Design proposals. Further upgrades implemented by early 2016 – see main body text Section 2.	27/11/15 Early 2016
G4	C4	Operator to ensure monitoring return are submitted on time.	On receipt of CAR

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 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 which 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 fulfill 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 (e.g. 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.