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|  | EPR Compliance Assessment Report | Report ID: WP3836ZF/0257351 | |
| 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 | 31/12/2015 | Time in | Out |
| What parts of the permit were assessed | Monitoring Returns July to December 2015 inclusive | | |
| Assessment | Report/data review | EPR Activity: | Installation X Waste Op Water Discharge |
| Recipient's name/position | Ian Roberts / Site Manager | | |
| Officer's name | Lara Cubley | Date issued | 01/03/2016 |

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

| | | | |
|--|--|----|------------------|
| 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 | N | |
| | 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 | 2.2.1.3 |
| | 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 | 4.1.2.4, 5.1.2.1 |
| 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

| | | | |
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| Number of breaches recorded | 4 | Total compliance score (see section 5 for scoring scheme) | 4.3 |
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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.

This compliance Assessment Report covers Monitoring Returns required by the Permit for the period July to December 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. July's data received 08/09/15, September's data received 16/11/15, November's data received 04/01/16. **Permit Breach G4 – Reporting & Notification CCS = 4 (X2) for quarter Jul – Sept & Oct – Dec 2015. Enforcement response – Warning. The Operator must ensure monitoring returns are submitted in-time.**

The following breaches of Permit ELVs were recorded by the CEM for this period:

- 17/08/15 Particulate concentration of 34.1mg/m³ and 32.7mg/m³ half hourly averages when the ELV is 30mg/m³. Part A & B notifications received 19/08/15 and 14/09/15.
- 18/09/15 HCl concentration of 68.4mg/m³ half hourly average when the ELV is 60mg/m³. **No Part A notification was received within 24 hours as required by the Permit. Part A & B received together 01/10/15.**
- 18/09/15 SO₂ concentration of 238.9mg/m³ half hourly average when the ELV is 200mg/m³. **No Part A notification was received within 24 hours as required by the Permit.** Updated Part A & B received including HCl breach 16/11/15. This attributes the breach to waste processed but no problematic waste being identified. **The Operator is to ensure appropriate root cause analysis is conducted.** Condition 5.1.2.1 requires Part A information to be provided within 24 hours. **Permit Breach G4 – Reporting & Notification CCS = 4.**

Following review of the CEM data we have the following concerns which require investigating/correcting:

- August CO data records a maximum 10 minute concentration of 294mg/m³ yet 0 exceedances of the 150mg/m³ ELV.
- August HCl data on invalid days do not correspond with the explanation of shutdowns.

- September data shows different numbers of invalid results for different determinands.
- October data has invalid results which do not tie up with explanations.
- October 14, 18, 20, 25 & November 1 – 4 concentrations show 0mg/m³ for maximum, mean, and minimum half hourly, and daily average.
- November 23, 27 – 30 & November 1, 2, 7, 20 concentrations show 0mg/m³ for maximum, mean, and minimum half hourly, and daily average.
- 05/12/15 HCl maximum half hourly average concentration of 58.6mg/m³ with an ELV of 60mg/m³ and 11/12/15 SO₂ maximum half hourly average concentration of 199mg/m³ with an ELV of 200mg/m³. **Has the Operator investigated such approach to limits?**

The Operator must report back on these concerns by the 01/04/16, together with a summary of procedures employed for review of such data and quality control prior to submission by Natural Resources Wales.

A1 Bi-annual Periodic sampling

Bi-annual monitoring of A1 was conducted in August 2015. Results provided demonstrated compliance with Permit ELVs. However, further monitoring revealed the following breach:

- 22/09/15 Mercury concentration of 0.06mg/m³ was obtained in periodic extractive monitoring against an ELV of 0.05mg/m³. Part A received 30/10/15 and Part B 10/12/15. **(Permit Breach CCS = 3 Emissions Air E1 recorded for quarter Jul – Sept 2015 inclusive above).**


The Operator installed a loss in weight system operational by 30/09/15. Further improvements have been recommended in Compliance Assessment Report (CAR) WP3836ZF/02545 dated 11/12/15. Mercury monitoring on the 23/12/15 showed compliance with the ELV. The Operator is to continue monthly monitoring of Mercury until 3 compliant results are obtained. The Operator is to undertake improvements recommended.

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. APC residues show Mercury concentrations to have decreased again at 132mg/kg and 144mg/kg.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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| Operator/ Permit | SITA Healthcare Limited | Date | 31/12/2015 |

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| 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. | <input type="checkbox"/> |
| 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. | <input type="checkbox"/> |
| We will now consider what enforcement action is appropriate and notify you, referencing this form. | <input checked="" type="checkbox"/> |

| 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 | | | |
| E1 | C3 | See Section 2 of Report | - |
| G4 | C4 | See Section 2 of Report | - |

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.