

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

Site	Wrexham Clinical Waste (HDU & TS) EPR/WP3636ZG		Permit Ref	WP3636ZG		
Operator/ Permit holder	Tradebe Healthcare National Limited					
Date	11/12/2015		Time in	09:30	Out	12:40
What parts of the permit were assessed	HDU abatement & validation, inspection of site & records					
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Ian Roberts - Site Manager					
Officer's name	Lara Cubley/Paul Wright		Date issued	18/12/2015		

**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 Conditions and Compliance Summary			Condition(s) breached
<b>a) Permitted activities</b>	1. Specified by permit	N	
<b>b) Infrastructure</b>	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
<b>c) General management</b>	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
<b>d) Incident management</b>	1. Site security	N	
	2. Accident, emergency & incident planning	N	
<b>e) Emissions</b>	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	C3	3.2.3
	5. Waste	N	
<b>f) Amenity</b>	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	N	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	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**

<b>Number of breaches recorded</b>	1	<b>Total compliance score</b> (see section 5 for scoring scheme)	4
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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.

A meeting and inspection were conducted on the 12th December 2015 to ascertain progress with the carbon dosing system on the incineration side and abatement and validation for the Heat Disinfection Unit (HDU). The inspection was also aimed at checking records and progress with previous issues identified. Although elements of the EMS are common to the HDU and incinerator installation the inspection is captured on two separate compliance assessment reports owing to the fact these activities are covered by separate permits.

We met with the new site manager whom has just recently come into post and the new Operations Manager.

### HDU

The ABC system for the HDU was in place and there are maintenance works planned over the Christmas period aimed at addressing issues identified in the audit on the 22/09/15. Planned works include;

- installing a new shredder,
- work to the abatement system to include relocation of the condenser to allow easier maintenance access,
- repairs/replacement of pipework,
- replacing bio-bed bark, and
- cleaning the scrubber unit.

The Operator then planned to do their quarterly sampling of emissions as required by the Permit. **The Operator was advised that monitoring should be representative of the process, i.e. it shouldn't always be planned straight after significant quarterly maintenance as this is likely to always portray the plant performing at its best.** The Operator requested delaying the quarterly monitoring until end of January 2016. It was agreed that this is acceptable but the Operator was advised to request this in writing. **The Operator is reminded to ensure pressure gauges are also part of the planned works to ensure they are performing as they should.**

A low breeze block bund around the hot oil boiler system was pointed out as being inadequate. Breeze blocks have become unseated from the flooring and mortar between breeze blocks was no longer bonded. The bund does not appear to be sealed and impermeable to oil.

**Condition 3.2.3 of the Permit requires all potentially polluting liquids to be provided with secondary containment. E4 Emissions to sewer CCS = 3 – The oil is within the building but there are drains to sewer in the locality. The potential environmental impact is seen as minor. The Operator is advised to ensure the bunding complies with current best practice guidance, i.e. it can hold 110% of the volume stored and where it is of block construction it is rendered and or sealed so that it is impervious to contents. A summary**

**review do demonstrate compliance with current guidance on secondary containment should be submitted to NRW by the 29/01/16. Where there are deviations from the guidance, the Operator must submit proposals for improvements with timescales. The Operator must ensure appropriate secondary containment it achieved by 26/02/16, or as otherwise agreed with NRW. Construction of secondary containment must be to the standards in CIRIA C736 Containment Systems for the Prevention of Pollution.**

The following queries were raised with respect to the recent HDU validation report:

1. The plant parameters at the time of the validation exercise were not provided and should be (i.e. temperatures, speed, treatment rate (kg/hr).
2. Process Description (Section 3 of the report) suggests there are no external discharges to atmosphere as air is re-circulated into the workplace. Please confirm as this is contrary to our understanding of the Permitted process.
3. Test timings and time taken for spore strips to pass through the treatment.
4. Not all lab certificates appear to have been provided for the stated number of tests and there doesn't appear to be any certificates for the 6 controls.
5. The lab certificates state that the samples were outside the recommended time frame from sampling to analysis implying the validity of the results may be effected. Please confirm which results this may be applicable to.
6. The lab certificates indicate with an asterisk that this test is not UKAS accredited. Please confirm.
7. The minimum number of spore strips to be recovered per collection or cycle of a plant with >750kg/hr throughput is 12 (see table on page 56 of EPR5.07) contrary to 10 required stated in section 4 of the report.
8. The report states 15 canisters were loaded per cycle but the results do not show 15. Please confirm whether any were not recovered.
9. Calculations should be provided, i.e. control results and hence calculation of 4 log<sub>10</sub> inactivation.

**The Operator is requested to advise us how these comments have been addressed and re-submit a revised validation report by 29/01/16.**

The Operator is to provide additional information requested in order to assess the ability of the Installation to treat blood bags.

### **Site Inspection**

Housekeeping had improved marginally but there was still a build-up of floc and dirt noted at the margins of the yard which are not heavily trafficked. The control room was noticeably dirty and the eye wash out of date. **Housekeeping should be improved and controls to ensure first aid consumables are in date instigated.**

Some areas of hardstanding were noted to have deteriorated although they still appeared to be holding water.

The drip tray/bunds for IBCs and diesel where checked and had been emptied of rainwater.


The yard was busy with a lot of bins and vehicles delivering waste. It appeared chaotic and was not easily obvious which bins were full or empty. This could cause confusion especially in an emergency or abnormal situation. The new Site Manager acknowledged this and had already identified potential improvements. **The Operator must ensure bins are stored in designated areas which are clearly demarked and signed.**

The shift logs do not all have a date at the top, which would make them difficult to trace if the file got disturbed. There are also some parameters on shift logs that are duplicated in the 'operator 2 hourly log'. **The shift logs should all be dated for document management purposes and it is recommended that duplication be minimised.**

The Operator is reminded of his duty under the Permit to report minor operational changes to techniques incorporated from the application and permitting process. To not report such changes constitutes a breach of the Permit and could incur enforcement action.

Some Duty of Care transfer notes were reviewed. The Operator is to ensure they are signed and dated.

*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.*

	<b>EPR Compliance Assessment Report</b>	Report ID: WP3636ZG/0254573
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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.	
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.	

**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			
E4	C3	A summary review do demonstrate compliance with current guidance on secondary containment should be submitted to NRW by the 29/01/16. The Operator must ensure appropriate secondary containment it achieved by 26/02/16, or as otherwise agreed with NRW. See Section 2 of CAR.	29/01/16 26/02/16

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](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.