Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0040455

Permit being assessed: PP3430UL. For: Bridgend Clinical Waste Treatment Plant and Transfer Station, held by SRCL Limited At: S R C L Ltd, Unit 12, Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Brynmenyn, Bridgend, Bridgend, CF32 9SZ. **Type of assessment carried out:** Report/Data Review, Reason: Routine. On 23/09/2022. Parts of permit assessed: Improvement conditions **NRW Lead Officer:** Mostyn Wall. **Report sent to**: Marianna Hislop, Permit Compliance Manager on 23/09/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Action only (X)	
A1 - Specified by permit	Action only (X)	
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Result types are explained in more detail in the ‘Important Information’ section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the ‘Important Information’ section below.

2. What action is required?

Criteria	Action needed	Complete by
A1	Update FPMP as outlined in the CAR form	18/11/2022
A1	Contact names and phone numbers need to be updated for the FPMP and all SRCL EMS documents. The NRW incident number is incorrect. The correct number is 0300 065 3000 - this is for the 24-hour NRW incident hotline.	18/11/2022
A1	BAT 3. SRCL to complete sampling of the emissions to sewer to complete the emission inventory.	30/11/2022
A1	BAT 19. SRCL to send in a report from a certified quality auditor or a report from the construction phase of the site is required.	18/11/2022
A1	BAT 21. Action: Site to update the EMS and FPMP to detail how spillages/fire water is contained to prevent the pollution	18/11/2022

Criteria	Action needed	Complete by
	of the environment. Please detail steps how the site prevents emissions/water from entering rivers, streams, groundwater, and local receptors.	
A1	BAT 41. Action: SRCL to submit to NRW EMS documents and standard operating procedures for monitoring emissions for Dust, NH_3 and TVOC.	18/11/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

SRCL was issued the WT Bref permit, EPR/PP3430UL/V007, on the 07.05.2021. The permit had several improvement condition requirements listed under table S1.3. SRCL sent in numerous documents relating to the improvement conditions in 2022. Each improvement condition is discussed below.

IC1 – Fire Prevention and Management Plan

SRCL submitted a fire prevention and management plan (FPMP) to NRW on the 5.8.21 alongside an incident response plan that forms part of the sites EMS. The FPMP needs some additional actions to bring the document up to the standard required by the NRW guidance note 16.

Actions:

SRCL is required to show the location of the emergency services box on the site plan and ensure that the FPMP and incident response plan is always available in the box.

The amount of waste received daily needs to be added to the FPMP. Add a plan of the mezzanine floor so the complete site layout is included in the FPMP. Highlight where the containers are stored.

SRCL needs to elaborate further on the common causes of fires as listed in the NRW guidance

- Plant or equipment failure
- Plant and hot exhausts
- Build-up of loose combustible waste and fluff
- Leaks and spillages of oils (for example the hot oil used in the holoflite screw)

Ensure escape and evacuation routes around the permitted area and within buildings must not be compromised by stack layout.

Improve the resolution of the workflow on section 2.9 of the FPMP so it can be read easily.

The FPMP needs to detail how fire water is contained to prevent the pollution of the environment. Please detail steps how the installation prevents water from entering rivers, streams, groundwater, and local receptors.

Examples from the FPMP: Secondary and tertiary containment facilities for fire water run-off include:

- *impermeable bunds*
- *storage lagoons*
- *shut-off valves*
- *isolation tanks*
- *modified areas of your site such as a car park*
- *pollution control equipment such as fire water booms and drain mats to block drains or divert fire water*

You may also be able to divert fire water to your local sewers. You will need agreement in principle from the sewerage company before including this measure in your fire prevention plan (evidence of approval will need to be submitted in the plan). Please refer to the NRW guidance note 16 for further information.

During and after an incident. Your FPMP must have contingency measures in place for dealing with issues during and after a fire. Please add these to the plan. For example, these could include:

- diverting incoming wastes to alternative sites during a fire
- having a plan for how you will notify those who may be affected by a fire, such as nearby residents and businesses
- contractors that might be used to assist with additional plant for firefighting techniques, removal of waste material, containment and removal of excess water run-off

Ensure that the FPMP is available to all staff and is included in the staff training.

Storage of containers and fire risk. A description of the storage of containers in the mezzanine area is required in the FPMP. Please describe the stack sizes for the containers (width, height and distance from walls as described in Table 2 of guidance note 16.)

SRCL to merge parts of the EMS document, incident response plan, into the FPMP. For example, the site chemical inventory should be included in the FPMP.

Contact names and phone numbers need to be updated for the FPMP and all SRCL EMS documents. The NRW incident number is incorrect. The correct number is 0300 065 3000 - this is for the 24-hour NRW incident hotline.

IC 2 – BAT 1 EMS

A meeting was held on the 12.08.22 to discuss the improvement condition and to evaluate the compliance of the environmental management system (EMS) with the Waste Treatment BAT conclusions. Marianna Hislop gave a demonstration of SRCL's internal safety and environmental management system (SMES). The SMES is an online management portal that contains the policies, procedures, and management of SRCL UK operations and environmental management (EMS), finance and procurement, safety, health and compliance training, sales and marketing, emergency preparedness and incident management, maintenance and facilities management and transport.

The SMES is a comprehensive management system that can track performance of the business (e.g. waste movement) and staff training, awareness and competence. Staff training is logged and alerts are set up for training renewal, technical maintenance of the business and permit reporting. The SMES system uses a dashboard display to bring up performance, targets and results. The dashboard methodology is excellent at communicating the EMS to the internal staff, management and to external regulators like NRW.

Training for staff is online with an assessment required to pass each module. Training is tracked and alerts are set up to remind staff and the business to refresh training.

The SMES system and dashboard analysis allows internal benchmarking within SRCL's UK business. Performance across SRCL's global business is then used to promote and drive performance internally. SRCL is also part of a wider industry body that can be used for external benchmarking and improvements with the business.

The SMES details all the standard operating procedures (SOPs) and methodologies used at the installation. Flow charts are used to describe the operation. Fire and Accident & Emergency plans are on the SMES. Hard copies of the emergency plans and SOPs are kept at the installation for staff to use in an emergency.

All data and records are stored, retained, and backed up.

SRCL have an annual review of the EMS and have 2 district review meetings.

The EMS system in place meets the BAT requirements and improvement condition 2.

IC3 – "*BAT 2*. *Improve the overall environmental performance of the plant*

f. Ensure waste compatibility prior to mixing or blending"

Improvement condition is met by SRCL. The installation has waste acceptance checks on site to verify that the packaging conforms with the description of the waste, this process is fully documented in the company business management system. Prior to the waste entering the shredder and treatment (where waste is mixed) the waste is tipped into an inspection hopper for a visual check. Every cart is checked in full in the inspection hopper before entering the treatment process. This process meets the BAT requirements improvement condition 3.

IC4 - BAT 3. Establish and to maintain an inventory of waste water and waste gas streams to facilitate the reduction of emissions to water and air

BAT 3 (i) Part 3a & b, *simplified process flow sheets showing emission sources & process-integrated and wastewater/waste gas treatment descriptions including performance*. SRCL has submitted a process flow diagram and description of the processes at the installation. The descriptions of the water treatment detail how the wastewater is produced from the washing of the wheeled carts, the process condenser and bio-beds and goes directly to the water sewer. There is no treatment of water onsite, all wastewater is discharged through an agreed trade effluent discharge consent. The information provided by SRCL meets the requirement for part 3 (i) a & b of BAT 3 and improvement condition 3.

Bat 3 (ii). Information on characteristics of wastewater streams

SRCL submitted an overview of the wastewater emissions, however further samples are needed to have a statistically viable sample set and have a full overview of the emissions to water.

Action: SRCL to complete emission to water sampling.

IC 5. Bat 7 Monitor emissions to water

Refer to IC 4. Monitoring of emissions to water to be decided by NRW once monitoring of the emissions to sewer has been completed by SRCL.

IC 6. BAT 8. Monitor emissions to air

Refer to IC 13

IC 7. BAT 12. Odour management plan.

The site has sent in a copy of the odour management plan. The odour management plan meets improvement condition 7

IC 8 BAT 19. This improvement condition has been set for the operator to confirm that the sites impermeable surface meets the relevant engineering standard.

The site states that the sites surfaces are made up of impermeable surfaces. Further evidence is required to back up this claim that the surface meets ciria736 standard.

Action – SRCL to send in a report from a certified quality auditor or a report from the construction phase of the site is required.

IC 9 BAT 20 Reduce emissions to water

Refer to IC 4.

IC 10 BAT 21 Emissions from accidents and incidents.

SRCL submitted an accident management plan in response to IC 2 and IC 10 and an overview of the sites EMS accident procedures was discussed on the 12.08.22. The site had processes to record all accidents (injuries, needle pricks etc) and to compare sites within SRCL's global business. SRCL EMS system is an effective tool to monitor emissions from accidents and monitor incidents. SRCL meets the requirements of the improvement condition. However further improvements are required to update the FPMP.

Action: Site to update the EMS and FPMP to detail how spillages/fire water is contained to prevent the pollution of the environment. Please detail steps how the site prevents emissions/water from entering rivers, streams, groundwater, and local receptors.

IC 11 BAT 23 Use energy efficiently.

SRCL has sent in an Energy Efficiency Plan and is accepted by NRW to meet the BAT 23 requirements and improvement condition 11.

IC 12 BAT 40. Improve overall environmental performance by monitoring the waste input as part of the waste pre-acceptance and acceptance procedures for the physico-chemical treatment of solid and/or pasty waste

Waste input does not have to be sampled as SRCL follows the healthcare waste acceptance guidance. Waste sources are audited by SRCL, and each container is inspected prior to treatment.

SRCL meets the requirements of BAT 40 and improvement condition 12.

IC13 BAT 41. BAT associated emission level (BAT-AEL)

SRCL submitted a response to the improvement condition 13. SRCL stated that they do not believe that dust emissions monitoring is applicable to healthcare waste treatment as the process does not generate dust. SRCL also stated that they do not believe that ammonia emissions monitoring is applicable to healthcare waste treatment.

Monitoring for dust is required the permit as SRCL have a HEPA, scrubber and bio filter abatement systems in place as required in BAT 41 for emission points A1 and A2 (Reduce emissions to air of dust, organic compounds and NH3).

The HEPA filter function is to remove dust from the shredder and treatment plant. The monitoring of the dust is required to ensure that the HEPA filter, scrubber and bio filter abatement systems are working correctly, to monitor abatement efficiency and to meet the BAT requirements (BAT 8 and 41).

NRW cannot agree to the removal of the monitoring requirement for dust. The point source emissions to air monitoring requirements and limits in Table S3.1, Schedule 3 (b) of the permit cannot be changed.

Action: SRCL to submit to NRW EMS documents and standard operating procedures for

monitoring emissions for Dust, NH3 and TVOC.   END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?
In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities
- A1 Specified by permit

B: Infrastructure
- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management
- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management
- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions
- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity
- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting
- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency
- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.