

Compliance Assessment Report CAR_NRW0040331

Permit being assessed: WP3636ZG.

For: Wrexham Clinical Waste Treatment Facility (HDU & TS), held by Tradebe Healthcare National Limited

At: Tradebe Healthcare HDU & TS, Marlborough Road, Wrexham Industrial Estate, Wrexham, Wrexham, LL13 9RJ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 30/08/2022 between 13:36 and 15:51.

Parts of permit assessed: Various

NRW Lead Officer: Rebecca Harwood, accompanied by Lara Cubley.

Report sent to: Alan Rhodes / Peter Stunden, SHEQ Lead / Site Manager on 14/10/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B5 - Infrastructure - Plant and equipment	C3 Minor	Condition 2.3.1(a)
E1 - Emissions - Air	C3 Minor	Condition 3.1.1
C1 - General Management - Staff competency/training	C2 Significant	Condition 1.1.1
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3 Minor	Condition 3.2.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
4	43

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
B5	see text below	Already completed
E1	see text below	Already completed
C1	see text below	Already

Criteria	Action needed	Complete by
		completed
G4	see text below	31/10/2022
G2	see text below	Already completed
B3	see text below	31/10/2022

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report follows an unannounced inspection of the HDU and Waste Transfer Station at Wrexham on 30 August 2022.

The Site Manager was on site during the visit.

HDU

Greater quantities of steam than have previously been observed were seen being emitted from the HDU through the lagging and out into the atmosphere through the open roller shutter door (Photo 1).

On further inspection of the plant, it was observed that there was a pipe missing that connects the condenser to the scrubber. The HDU was operating without being connected to the Holoflite abatement system. An offensive odour was detected coming from the open pipe. Liquid was also seen dripping from this pipe and pooling on the floor (Photo 2).

The Site Manager was unaware as to the reason for the unconnected pipe. Following discussions with site staff it was stated that the fan linked to the condenser had been sent for repair on 18 August 2022 and had not been returned. The HDU has been operating without this abatement and discharging emissions into the building since 18 August 2022. **This has been scored a Category 3 breach of Condition 2.3.1(a) - operating techniques and operating without the Holoflite abatement system.**

This point source emissions are not authorised under the permit. **This has been scored a Category 3 breach of Condition 3.1.1 - emissions.**

Action 1 (completed): The HDU must not be switched back on until it can be demonstrated to NRW officers that the plants abatement is connected and operating correctly.

Once officers had left site the Site Manager confirmed via email that the HDU had been

switched off at 16:00. A NRW officer attended site on 1 September 2022 and confirmed that the plant was off.

The Operator has since restarted the HDU having confirmed that the fan has been reinstated and the abatement reconnected.

NRW officers raised concerns that the Site Manager was seemingly unaware of the issue, that this issue had not been identified during the daily checks and that there again seemed to be a lack of communication between the maintenance and operational teams. The Site Manager stated that daily morning meetings are held. It is unclear whether there had been any communication about this issue at these meetings. **This has been scored a Category 2 breach of Condition 1.1.1 - competency.** This will be reviewed and updated as necessary on receipt of the information requested in Actions 2 and 3 below and further non compliances may be added.

Action 2 (completed): For the period covering the period 18 August - 30 August 2022 inclusive please provide daily check sheets, evidence of who the CoTC holder was and notes from daily meetings to NRW by 9 September 2022.

Any failure of the abatement or plant should be reported to NRW in accordance with Condition 4.3.1(b). It was stated during the visit that the fan had been removed on 18 August 2022, NRW highlighted this issue to the operator during a routine inspection on 30 August.

Action 3: Undertake a full investigation into why the fan was removed and why the HDU continued to be operated without abatement. This investigation should be forwarded to NRW when completed.

Drainage

Flock from the HDU is stored in a roll on roll off container inside the building. Pooling liquid was seen outside the entrance to the building where the container sits (Photos 3, 4 and 5).

Action 4: Investigate the source of the pooling liquid and demonstrate the integrity of the HDU bund. Report back the findings of your investigation to NRW.

On review of the drainage plans previously submitted, this liquid would be washed into the surface water drainage system when in next rains. NRW officers have previously been advised that the penstock remains closed and only opened when discharging, and that there is no underground storage tank. Drainage has been discussed previously on site visits and concerns linked to drainage remain outstanding. It is still unclear what happens to surface water from the site, when the penstock is opened and how suitability for discharge is assessed. If the penstock were to be opened then the likelihood is that this liquid would be washed into the surface water drainage system. **This has been scored a Category 3 breach of Condition 3.2.1 - potential to contaminate surface water.**

Action 5: Please confirm how the surface water drainage system operates and provide your procedures linked to surface water discharge, when the penstock is opened and how suitability for discharge is assessed to NRW.

Yard

The Quarantine area is now labelled, however, there were a lot of empty bins and other pallets in this area. It is recommended that this area is kept clear for quarantined waste.

Following previous visits a random selection of bins were again selected and it was noted that these had all arrived at site recently and no concerns were raised regarding storage times for those particular bins.

Training

Evidence was sought to see whether staff had been trained on the new waste storage procedure, however this could not be located on site. A number of other procedures have also recently been updated but evidence that these had been disseminated to staff could not be provided.

Action 6: Provide evidence that staff have been trained on updated procedures and submit this to NRW. Ensure this information is accessible on site and available for inspection.

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.