

Compliance Assessment Report CAR_NRW0041251

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 31/12/2022.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Mostyn Wall.

Report sent to: Marianna Hislop, Permit Compliance Manager on 17/02/2023.

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	1.1.1
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C4 No impact	4.2.3

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

Total number of non-compliances recorded	Total non-compliance score
2	4.1

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	Ensure that critical parts of the installation are available at all times to ensure that the sites operates following BAT and to prevent shutdown or delays in the healthcare waste stream.	31/03/2023
G1	Site to undertake the monitoring of dust and NH3 in 2023.	31/12/2023

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 Annual Returns

SRCL submitted their annual report to NRW on the 27/01/2023.

Efficacy Tests,

SRCL undertook 60 spore strips tests in 2022, with only 1 failure leading to a pass rate of 98%. The failure was reported to NRW. Following the failure SRCL monitored the process temperature closely to ensure the correct process temperature was maintained using thermal indicator strips and SRCL undertook inhouse testing to confirm efficacy was achieved. No spore sample failures have occurred since the initial notification. SRCL stated that the spore failure was most likely due to a minor leak of the oil filled screw that transfers heat to the process. The leak was quickly identified on one of the welded seams and a replacement screw has been ordered.

The spore failure was alerted to NRW on the 15th December. The replacement screw is planned to be installed on the 26th of February. This has resulted in a 10-week period with a fault in an essential part of the process. A two month wait for a replacement is a failure to operate and maintain the installation. A failure scenario would lead to a significant disruption to the healthcare waste chain in south Wales that could potentially lead to clinical waste building up at hospital sites, creating significant environmental impacts and human health hazards.

Non-compliance: A category 3 non-compliance is given due to the failure to replace the screw in a timely manner and to operate and maintain the installation. This is a breach under permit condition 1.1.1. **It is an offence under Regulation 38(2) of the Environmental Permitting Regulations (consolidated 2016) to breach a permit condition or emission limit. Non-compliance score 4.**

Action. Ensure that critical parts of the installation are available at all times to ensure that the site operates following BAT and to prevent shutdown or delays in the healthcare waste stream.

Bioaerosol Emission

Permit condition 3.3.1 requires SRCL

The bioaerosol monitoring are compliant with the permit.

Monitoring Location	Limit (cfu/m ² hr)	Pre dose (cfu/m ² hr)	1 st hour post dose (cfu/m ² hr)	2 nd hour post dose (cfu/m ² hr)	3 rd hour post dose (cfu/m ² hr)
Air – sample points < 10m from the treatment plant	1000	<4	76	4	<4
Air – sample points > 10m from the treatment plant	300	4	<4	<4	<4
Surface – sample points < 10m from the treatment plant	20000	308	422	393	230
Surface – sample points > 10m from the treatment plant	5000	< 159	104	< 129	225
Monitoring Location	At Dosing		20 minutes after dosing		
Discharge to water	300	<10	<10		

Annual Production and Treatment

A total of 7494.97 tonnes were treated in 2022.

Generation of residue waste was 7494.9 tonnes and generation of wastewater was 1722 m³ in 2022.

Total Energy usage of 2,560 MWh of primary energy was used in 2022.

Water usage was 741 m³/year at the site.

Emissions to Air

SRCL has sent in monitoring for emission points A1, Shredder hood via HEPA filter and A2 Heat disinfection unit via scrubber. TVOC for A1 was 59 mg/m³ and TVOC for A2 was 527 mg/m³.

Emissions testing for Dust and Ammonia (NH₃) is required by the permit every 6 months. Monitoring for dust and NH₃ is to ensure that the scrubber and HEPA filter for emission points to air, A1 and A2, meet the BAT requirements (BAT 41) and to monitor abatement efficiency.

Non-compliance: A category 4 non-compliance is given due to the failure to report the monitoring for dust and ammonia. This is a breach under permit condition 4.2.3. **It is an offence under Regulation 38(2) of the Environmental Permitting Regulations (consolidated 2016) to breach a permit condition or emission limit. Non-compliance score 0.1.**

Action

Site to undertake the monitoring of dust and NH₃ in 2023.

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.