

## Compliance Assessment Report CAR\_NRW0041809

**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 20/03/2023 between 09:00 and 12:00.

Parts of permit assessed: Improvement conditions

**NRW Lead Officer:** Mostyn Wall.

**Report sent to:** Marianna Hislop, Regional Compliance Officer on 11/05/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	C3 Minor (Suspended)	2.5
C2 - General Management - Management system and operating procedures	Action only (X)	

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

Total number of non-compliances recorded	Total non-compliance score
1	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
B1	SRCL complete the repairs of the impermeable surface at the installation and get hardstanding work certified by a quality auditor to complete improvement condition 8.	31/08/2023
C2	SRCL to give a timeframe for the completion of the firewater retention plans and to detail how the installation prevents water from entering rivers, streams, groundwater, and local receptors. Consult Guidance No. 16 Fire prevention and mitigation plan - waste management (naturalresources.wales)	31/08/2023

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.

**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

### 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. Following the submission NRW issued a CAR form (CAR\_NRW0040455) with actions for SRCL to improve the FPMP and to follow the guidance. SRCL submitted a reply to the CAR form in October 2022 with an updated FPMP and incident response plan.

The updated FPMP has completed the actions for IC1 from CAR\_NRW0040455. The only part of the FPMP that needs further attention is the firewater retention plans. Controlling firewater is essential to stop pollution from entering rivers, streams, groundwater, and local receptors.

SRCL have engaged with an external company who have carried out a drainage and topographical survey at the facility. This data will be used by SRCL to produce detailed firewater retention plans and to update the FPMP.

Consult the guidance document to ensure the plans - [Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](#)

**Action:** SRCL to give a timeframe for the completion of the firewater retention plans and to detail how the installation prevents water from entering rivers, streams, groundwater, and local receptors. Consult [Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](#)

IC4, IC 5, IC 9, BAT 3, BAT 7 & BAT 20. SRCL to complete sampling of the emissions to sewer to complete the emission inventory. Action complete.

SRCL has submitted 12 samples for Hydrocarbon Oil Index, Arsenic, Cadmium, Chromium, Copper, Nickel, Lead, Zinc, Mercury, PFOA & PFOS. In all the samples the 95% confidence level is below the ELV and shows that the parameters do not form a relevant part of the waste stream. In most samples the substance is not identified. The table below shows the sample results. HOI does not form part of the required AEL as none of the waste treatment process to which the BAT-AEL applies are permitted at the facility.

The site has a discharge consent with DCWW that monitors Chemical oxygen demand, Ammoniacal Nitrogen, Total Toxic Metals, Phosphorus, Sulphates as SO<sub>4</sub>, Suspended Solids and pH.

Average flow to S1 is 0.0001m<sup>3</sup>/s and the flow range is 0 – 0.00015m<sup>3</sup>/s. Flow rates are low and do not need to be recorded to NRW.

Substance / parameter	ELV mg/l	Sample 1	Sample 2	Sample 3	Sample 4	Sample 5	Sample 6
hydrocarbon oil Index (HOI)	<b>10</b>	17	0.3	1.1	0.9	2.2	1.2
Arsenic	<b>0.05</b>	<0.01	<0.01	<0.01	<0.01	0.01	0.01
Cadmium	<b>0.05</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium	<b>0.15</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
copper	<b>0.5</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
nickel	<b>0.5</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
lead	<b>0.1</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
zinc	<b>1</b>	<0.01	<0.01	<0.01	<0.01	0.05	<0.01
Mercury	<b>0.005</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PFOA (ug/l)	<b>Monitoring only applies if in inventory</b>	<0.0001	<0.1	<0.1	0.09	<0.1	<0.1
PFOS (ug/l)		<0.0001	<0.1	<0.1	0.09	<0.1	<0.1

Substance / parameter	ELV mg/l	Sample 7	Sample 8	Sample 9	Sample 10	Sample 11	Sample 12
hydrocarbon oil Index (HOI)	<b>10</b>	4.2	3.7	1.9	1.7	0.9	5.4
Arsenic	<b>0.05</b>	<0.01	<0.01	<0.01	<0.01	0.01	0.01
Cadmium	<b>0.05</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium	<b>0.15</b>	<0.01	<0.01	<0.01	<0.01	0.1	<0.01
copper	<b>0.5</b>	<0.01	<0.01	<0.01	<0.01	0.2	0.02
nickel	<b>0.5</b>	<0.01	<0.01	<0.01	<0.01	<0.01	0.01
lead	<b>0.1</b>	<0.01	<0.01	<0.01	<0.01	0.1	0.03
zinc	<b>1</b>	<0.01	<0.01	<0.01	<0.01	0.06	0.06
Mercury	<b>0.005</b>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
PFOA (ug/l)	<b>Monitoring only applies if in inventory</b>	<0.1	<0.1	<0.1	<0.1	0.5	<0.1
PFOS (ug/l)		<0.1	<0.1	<0.1	<0.1	<0.1	<0.1

## PFOA & PFOS

The 12 samples of PFOA and PFOS shows that they do not form a relevant constituent part in the wastewater inventory. Only 3 of the samples out of a total 24 samples contained any PFOA or PFOA at low concentrations of 0.09 and 0.5 ug/l. Any POPs contained within in the waste will be destroyed in the future waste incineration of the shredded flock. In addition, there are no BAT ELV's for PFOA and PFOS. Requirements for monitoring are only required if it is relevant part of the waste stream.

No monitoring to sewer is required for the parameters listed in Table S3.3 in the permit.

The improvement conditions for IC 4, IC 5, IC 9 are complete.

### **IC 8, 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.**

SRCL states the infrastructure (site surfaces) are also included as part of the daily site diary check, and any issues noted would prompt remedial actions to be taken. SRCL has not given any details on the construction of the sites hard standing or provided a certified quality auditor report on the impermeable surface. An impermeable surface is required to prevent groundwater contamination and to ensure the groundwater and aquifer at the site has not been damaged during the life of the installation.

SRCL have stated in a response to IC 1 that they have engaged a contractor to review the impermeable surfaces as part of a drainage and topographical survey of the site.

NRW visited SRCL on the 20<sup>th</sup> March 2023 to inspect the hardstanding and condition of the impermeable surface. Areas of damage and cracks can clearly be seen on the surface and where improvements can be made. SRCL showed NRW areas that will be repaired.

The poor state of the hard standing is a non-compliance under section 2.5 of the permit. However, the score is suspended as SRCL are working towards repairing the hardstanding and compliance with IC8 and BAT 19.

**Action:** SRCL complete the repairs of the impermeable surface at the installation and get hardstanding work certified by a quality auditor to complete improvement condition 8.

### **IC10, BAT 21 Emissions from accidents and incidents.**

The improvement condition is complete. However, the FPMP is required to detail how spillages/fire water is contained to prevent the pollution of the environment. This action is covered under IC1.

**IC 13, BAT 41.** Action: SRCL to submit to NRW EMS documents and standard operating procedures for monitoring emissions for Dust, NH3 and TVOC.

Action complete, SRCL has updated the EMS to reflect the monitoring requirements.

Site Visit 20<sup>th</sup> March 2023

Mostyn Wall and Linda Warrick from NRW visited SRCL to discuss the holoflite screw replacement. The old screw was inspected and the wear and tear on the screw edges were clear. Screw replacement was discussed, the timelines involved and how a screw is replaced in the plant. The holoflite machine has 4 screws and a heated jacket surrounding the screws that distributes heat to the shredded flock. If 1 of the 4 screws has a problem or a leak, the daily efficacy testing shows that heat can still be distributed by the 3 screws and jacket to maintain efficacy and heat distribution.

An inspection of the hard standing was undertaken outside the main building. Cracks and gaps in the hardstanding were clearly identified. SRCL is working with a contractor to address the hard standing and to comply with BAT 19, IC 8.

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](mailto: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](mailto: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.