

## Compliance Assessment Report CAR\_NRW0042431

**Permit being assessed:** WP3836ZF.

**For:** Wrexham Clinical Waste Treatment Facility (Incinerator), **held by:** Tradebe Healthcare National Limited

**At:** Wrexham Clinical Waste Treatment Facility (Incinerator) Marlborough Road , Wrexham Industrial Estate, WREXHAM, Clwyd, LL13 9RJ.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 17/08/2023 between 09:30 and 11:40.

**Parts of permit assessed:** various.

**NRW Lead Officer:** Rebecca Harwood, accompanied by Kathryn Bradshaw.

**Report sent to:** Alan Rhodes, SHEQ Lead, on 12/09/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4C - Information - Notification	Action only (X)	
IR1A - Management - General management	Action only (X)	

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

Total 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
IR4C	see text below	29/09/2023
IR1A	see text below	10/10/2023

Compliance 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**

This Compliance Assessment Report (CAR) follows a routine site inspection of the Clinical Waste Incinerator at Wrexham and updates from the Operator relating to recent emission reports and ERV openings.

Officers met with the SHEQ Lead, Site Manager, Plant Manager and Head of Operations.

Discussions were held regarding the recent emissions exceedances submitted to NRW, particularly in relation to particulates. At the time of the inspection the Operator was unsure what was causing the spikes and further investigations were to be undertaken during the upcoming planned shutdown. It was subsequently confirmed by Envirosoft that some of the particulate spikes correlated with the calibration being undertaken, further details relating to exactly which dates were affected is still to be provided.

**Action 1:** Submit outstanding Part B notifications once investigations have been completed, along with Envirosoft's report into the calibration spikes.

**Action 2:** Review procedures to ensure any CEMS calibration does not unduly impact emissions reporting and that if issues do arise these are identified promptly.

The Emergency Relief Valve has opened 14 times since 01/06/2023. The openings appear to be linked to issues with the boiler - low water level / high pressure. It was thought that the more recent of these openings were linked to a leaky blowdown valve. Officers queried why a leaky valve would not have been picked up as part of the PPM schedule checks. The Operator stated that further inspections would be undertaken during the shutdown.

**Action 3:** Review PPM checks to ensure relevant items relating to the ERV and maintenance are included. NRW may review these on a future compliance visit.

**Action 4:** Provide NRW with an update in to your investigations relating to the recent ERV openings by 10/10/2023.

The new 'What if' guides to assist staff with specific operations relating to the incinerator were being rolled out. The Plant Manager sent an update after the visit providing evidence of training to staff. Following the roll out of these guides the Operator has stated they are undertaking additional training for some staff to enhance their knowledge and understanding.

The routine maintenance outage is planned for 01/09/2023 and is expected to last around 7 days. The Operator stated that currently there were 16 weeks between shutdowns and that this frequency was being reviewed. It is noted that previously shutdowns occurred approximately every 12 weeks NRW raised concerns that reported emissions exceedances seemingly increased just prior to planned shutdowns and that more frequent shutdowns may be appropriate to help identify issues before they result in potential permit non compliances.

During the on site visit the incinerator was operational. There was a notable improvement in the tidiness of the area around the bin lift. It was noted that a new air compressor was being installed.

Work was in progress relating to the one way system being put in place. This will enable vehicles to enter the site via the main entrance / weighbridge and exit directly onto Abbey Road South.

It was confirmed that access gates will be installed along Marlborough Road at the entrance to the car park / trailer storage area.

A random selection of bins were checked to ensure these were compliant with storage requirements at the site. No issues were identified.

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.

**If your assessment result in Section 1 is suspended, what does this mean?**

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 compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition 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 twenty 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 to 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.