

Compliance Assessment Report CAR_NRW0042501

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: 21/09/2023 between 12:30 and 15:00.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood, accompanied by James McClymont.

Report sent to: Alan Rhodes, SHEQ Lead, on 16/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Emissions and monitoring - Emissions to water, air or land	Action only (X)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.1
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3C - Emissions and monitoring - Odour	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A	see Action 1 below	31/10/2023
IR3B	see Action 2 below	31/03/2024
IR3B	see Action 3 below	16/11/2023
IR3B	see Action 4 below	16/11/2023

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 the quarterly meeting and routine site inspection of the Clinical Waste Incinerator at Wrexham.

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

Updates were provided relating to the incinerator, future plans and investment being made at the site.

The plant was shutdown from the 2nd to 9th September 2023. Work had been undertaken during the shutdown to investigate the causes of recent ELV exceedances and the increased number of ERV openings.

Envirosoft had confirmed there had been issues with the calibration of the particulate CEMS and that this was causing a number of the recent particulate exceedances.

Action 1: As requested in CAR NRW0042431 please submit the Envirosoft investigation report to NRW and confirm which exceedances were a result of the calibration issue by 31/10/2023.

A new bag was being trialled in the bag house, the effectiveness of this would be reviewed at the next shutdown.

The Operator stated that the ERV logic is controlled by a safety chain and that this was

being investigated to identify exactly what was alarming and therefore triggering the ERV to open. It was stated that the recently installed compressors should reduce the number or ERV openings related to specific compressor issues. A number of the recent openings are also linked to boiler pressure and low water levels within the boiler. These issues are currently under investigation. An action was included within CAR_NRW0042431 linked to the recent ERV openings, this was due by 10/10/2023.

The Operator confirmed that CEMS was being installed for Hydrogen Fluoride, Mercury and Ammonia in advance of the BREF implementation date. Ammonia CEMS would be required if SNCR were to be used in the abatement process.

Officers reminded the Operator that the permit application for the use of SNCR within the abatement system to reduce NOx should be submitted as soon as possible in order to facilitate compliance with the permit from 3rd December 2023.

Further work is planned to improve both the site and building infrastructure.

During the site visit there was what looked to be a fabric bandage caught on the hopper / bin lift that was hanging down into the bin loading area. Officers raised concerns regarding this and the possibility of this catching fire leading to further issues. The issue of waste escaping from bins as they are loaded has been raised previously with the Operator.

The kiln guillotine door was also not closing and flames were seen escaping into the hood. The Operator stated that a bag had got stuck at the entrance to the kiln and the loader pusher plate was unable to clear it resulting in the guillotine door being unable to close. The Operator stated at time that this was probably causing the flames. **There was an unauthorised emission into the building that was not captured by the kiln feed hood, this has attracted a category 3 score for breach of condition 3.1.1.**

The Operator has subsequently stated that the engineering department and the contractor managing the improvement works have been to site to review the operation. A report relating to this investigation and the works required to avoid a recurrence is pending. The Operator has stated that any improvements to the system are scheduled for Q1 2024.

Action 2: Ensure improvement works to the bin loading and loader pusher plate mechanisms address the issues raised, ensuring that all waste is emptied from bins and loaded into the kiln without spillage. Any works should encompass the bin lift / kiln feed hood to avoid further emissions into the building. This effectiveness of any works will be assessed by NRW during future inspections.

The site is undertaking a bin rationalisation programme and bins relating to other operators are currently being removed, along with bins that are no longer serviceable being repaired or taken away.

The Quarantine area has been relocated to the rear boundary of the site and will become more accessible as the excess bins are removed. Officers noted that there was some damage to the kerbing at the back of the site and advised the Operator that this should be added to the maintenance schedule as well as the site checks to ensure that any spillages are contained within the site. Further assessment of kerbing will be undertaken during future site inspections.

A steam leak was observed on the steam supply pipe to the Heliex system. The noise from the leak was clearly audible, however, due to the location of the leak repairs could not be completed until the plant is shutdown. A specialist welder and statutory pressure systems examiner to witness the repair are required. Subsequent correspondence with the Operator indicates this will be completed on 16th October 2023.

Action 3: Confirm to NRW when the repair has been made. An investigation should be carried out into the cause of the pipe failure, including what checks are in place to maintain the pipework and whether further mitigation measures could be put in place to avoid a recurrence. An update should be provided to NRW by 16/11/2023.

IBCs are now stored on bunds in a trailer adjacent to the site office. This trailer is not sited on the recently resurfaced hardstanding area but on an area of unmade ground which is not covered by the improved drainage system. Officers raised concerns regarding possible leaks from the trailer onto the unmade ground.

Action 4: Review the location of the trailer and update the associated risk assessment linked to the use of the trailer for IBC storage to ensure there is no risk of groundwater contamination. This should be completed and forwarded to NRW by 16/11/2023.

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 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.