

Compliance Assessment Report CAR_NRW0042954

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: 06/12/2023 between 09:50 and 12:45.

Parts of permit assessed: various.

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

Report sent to: Alan Rhodes, SHEQ Lead, on 18/12/2023.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| IR2C - Operations - Operating techniques | C3 Minor | 2.3.1 |
| IR1A - Management - General management | Action only (X) | |
| IR3C - Emissions and monitoring - Odour | Assessed (A) | |
| IR3D - Emissions and monitoring - Noise and vibration | 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 |
|----------|--------------------|-------------|
| IR2C | see Action 1 below | 17/01/2024 |
| IR1A | see Action 2 below | 29/02/2024 |

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 a routine site inspection of the Clinical Waste Incinerator at Wrexham as a result of recent changes at the site following the BREF permit variation.

Officers met with the SHEQ Lead, SHEQ Officer, and Site Manager.

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

The Operator advised that they are going into a planned shutdown from 6th January 2024 and that previous issues relating to the kiln hood and waste loading would be addressed during the shutdown.

Gore bag filters are to be trialled in the baghouse prior to the shutdown to review their effectiveness. All the bag filters are due to be replaced as part of the shutdown.

The lime silo is now not in use. This will be emptied and removed from site during 2024. 1.2t bags of lime are being used instead to reduce clumping and associated issues. A bag suspension frame is to be installed during the shutdown enabling better control and monitoring of lime usage.

The Operator has reviewed the frequency of shutdowns and stated that they have reverted back to quarterly shutdowns. It is hoped that this will reduce the number of emission exceedances that coincided with the longer operating periods between shutdowns.

Site Inspection

The Operator is currently adding urea to the plant to reduce NOx emissions. Although this abatement assists in reducing the emissions of NOx in order to meet the lower emission limits following the revised permit, this system itself has not been permitted. **This has been scored a category 3 breach of Condition 2.3.1 Operating Techniques.** The Operator submitted a permit variation in October to formalise the process, however, this is currently in the permitting queue and has not yet been duly made. The Operator has installed

ammonia CEMS as part of their process to ensure there are no adverse emissions from the abatement.

Action 1: A formal action plan shall be submitted to NRW stating how the Operator intends to operate the SNCR abatement, including how they are going to mitigate against any potential environmental issues, whilst the permit variation is being determined. This should be submitted to NRW by 17th January 2024.

Officers viewed the CEM monitors within the control room. The new emission limits related to the permit variation and BREF requirements had been updated on the system. Mercury and hydrogen fluoride CEMS have been installed.

NRW have received a request to review the monitoring requirements for both mercury and dioxins. This has been submitted as part of the UK Waste Incineration Interpretation Document protocols, allowing operators to demonstrate that their dioxin emissions are sufficiently stable/that their waste content has a low and stable mercury content. This request and associated supporting documentation is currently being reviewed by NRW.

Action 2: A further review of THC 121 Incinerator Environmental Monitoring Responsibilities and any associated procedures should be undertaken to ensure that they reflect current practice and that staff are aware of their responsibilities. This should be completed by 29th February 2024.

Following a previous shutdown and submission of a Schedule 5 Notification, NRW had raised queries linked to the timings of waste loading. It was noted that the loading of waste commenced after the kiln was up to temperature, however, the temperature subsequently dropped to just below the 850°C threshold for a couple of minutes and waste continued to be loaded. Officers discussed the possibility of amending the waste inhibit with the Operator to avoid this scenario reoccurring.

Advice and Guidance: Update the waste inhibit to reduce the risk of temperatures falling below 850°C when waste is fed into the hopper.

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.