

## Compliance Assessment Report CAR\_NRW0043780

**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:** 15/03/2024 between 12:55 and 14:15.

**Parts of permit assessed:** various.

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

**Report sent to:** Alan Rhodes, SHEQ Lead, on 27/03/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR2C - Operations - Operating techniques	C3 Minor (Suspended)	2.3.1
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	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
IR3B	see Action 1 below	30/04/2024

Criteria	Action needed	Complete by
IR2C	permit variation has been submitted and is in the permitting queue - continue to operate in accordance with action plan	31/05/2024

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 follows an unannounced inspection of the site on 15 March 2024 following recent reports from the Operator of elevated particulate emissions.

Officers met with the SHEQ Lead, SHEQ Advisor, Plant Manager and the new Site Manager.

Following discussions related to recent emissions and works undertaken during the January maintenance shutdown officers undertook a site inspection.

Action 2 from CAR NRW0042501 stated: *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.* The Operator has undertaken work to the bin loading mechanism to reduce the amount of waste spillages, however, emissions from the kiln feed hood were still evident during this visit. The Operator stated that the work was not as effective as anticipated and additional works have been scheduled to further contain these emissions during the April shutdown, commencing 02 April 2024.

This issue was subject to a non compliance previously and further non compliances may be applied if the upcoming works do not resolve the issue.

The guillotine door mechanism has become damaged as a result of a bearing issue on the kiln and the kiln becoming out of alignment. This meant that the guillotine door was dislodged and not always closing, it is thought that this may have contributed to the elevated particulate emissions. The emission exceedances will be reviewed separately as part of the quarterly monitoring data return. Further work is to be undertaken during the April shutdown to review the damage and operation of the kiln guillotine door.

A steam leak was noted coming from the boiler crown valve, it was stated that this would be repaired during the April shutdown.

**Action 1:** An update should be provided to NRW with regards to the works undertaken during the January and April shutdowns, including, but not limited to, the works referenced above. This should be submitted to NRW by 30 April 2024.

The new bag suspension frame for the carbon and lime dosing system had been installed and seemed to be working well. The dosing is automatically adjusted and linked to the CEMs.

The Operator continues to operate the urea dosing system and this is having a positive impact on reducing NOx emissions. The system is fully automated reducing the amount of urea previously used and the urea tank is being filled monthly. Dosing rates at the time of the visit were 230l/hr with the ratio 10% urea / 90% water. The Operator stated that an ammonia CEMs had been installed and is monitored, although this data is not currently being submitted to NRW as the NOx abatement has not yet been permitted. **This has been scored a category 3 breach of Condition 2.3.1 Operating Techniques - suspended.**

The permit variation was submitted to NRW in October 2023 and is in the permitting queue to be duly made. An action plan has been submitted by The Operator whilst the variation is determined. NRW have reviewed the action plan and are waiting for clarification over a couple of points.

A QAL2 was undertaken at the end of January 2024 following issues with the gas flow probe interfering with the particulate monitor. This report was submitted to NRW after the inspection and will be reviewed as part of the Q1 2024 data return.

The Operator stated that the roller shutter doors where the HDU was previously sited are scheduled for replacement. However, the gates to the trailer / car parking yard area, although identified as requiring installing, have not yet been programmed and this remains a concern to NRW with regards security and managed access onto the site. Actions relating to this are detailed in CAR 0043845.

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.