

## Compliance Assessment Report CAR\_NRW0044560

**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:** 18/06/2024 between 10:37 and 13:44.

**Parts of permit assessed:** See report.

**NRW Lead Officer:** Kathryn Bradshaw, accompanied by Daniel Grant.

**Report sent to:** SHEQ Officer, SHEQ Officer, on 16/08/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	1.1 General Management
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.1 Emissions to water, air or land

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR1A	1) Ensure SAP system is fully implemented with all the information referenced in the procedure, is accessible to all relevant staff and staff are fully trained in the use of the SAP system. 2) Ensure all pre-acceptance audits are completed and in	29/11/2024

Criteria	Action needed	Complete by
	date for all wastes accepted to site. 3) Review management systems to link the pre-acceptance audits with the new SAP system	
IR3B	Provide a detailed timeline of what works are required and when these works are to be undertaken to reduce the kiln hood emission. The timeline should be submitted to NRW by 27th September	27/09/2024

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 a pre-arranged site visit to complete a hazardous waste audit.

Officers met with the SHEQ Lead, SHEQ Advisor, Site Manager and Key Account Manager. The operator provided an update on what work has been progressing and completed. Discussions were held around the QAL 2 calibration and recent dust ELV exceedances. The operator, during the last shut down, had thoroughly cleaned the area down, clearing out historic dust wells found in the equipment. However, this has not resolved the issue of breaching particulate ELV's and the site logged dust exceedances when the plant was not running.

The operator has also purchased a second particulate probe to run in parallel to the one already installed to further verify the data. The recent dust exceedances and calibration factors will be dealt with in a separate CAR form.

The Group SHEQ Lead is still covering the TCM role and has provided certificates for a consultant to cover whilst they are on holiday.

Staff provided a site tour and updates of the most recent works which included the installation of 2 new roller shutter doors (Doors 4&5) and completion of the repairs to the kerbing alongside the perimeter chain mail fence. Repairs to the expansion joints on the yard are scheduled to start on 24/06/24 prioritising the high traffic areas. These actions were referenced in CAR\_NRW0043780. However, the gates to the trailer / car parking yard area have still not been planned in and this remains a concern to NRW with regards

security and managed access onto the site.

Fugitive emissions could be seen escaping from the kiln feed hood as waste had just been loaded. The operator explained that all the work had been completed on the hood, but it has highlighted a further problem with the guillotine door not sealing correctly. These releases were only seen when waste had just been loaded. The operator states this issue will be examined during the next shut down period.

As the issue has been raised previously and there continues to be an unauthorised emission into the building a **Category 3 score has now been applied against Condition 3.1.1.**

### **Action**

Provide a detailed timeline of what works are required and when these works are to be undertaken to reduce the kiln hood emission. The timeline should be submitted to NRW by 27th September.

### **Waste Acceptance**

Several barcodes were taken from a random selection of bins that were being stored in the yard outside which were then checked against the new SAP system that has been installed. Unfortunately, the data for all the bins could not be accessed at the time of inspection and a list has been emailed to the site to provide all the details for 6 bins that were being stored in the yard area including electronic copies of the consignment notes. THC Waste Acceptance and Rejection procedure details all of the information that should be available on SAP in Section 13 Waste Tracking. The SAP system is not working as per this procedure and it appeared staff needed more training on this system.

Several consignment note numbers were taken from Q1 2024 consignee returns data to check if Pre-Acceptance Audits had been completed on these producers. Several of these were out of date or missing and there was no system linking these audits to the SAP system where waste is received into. The site is currently looking into the possibility of linking these two systems.

**CAT 3 score against 1.1 General management for inability of SAP system to provide all the information referenced in the procedure and for out of date pre-acceptance audits.**

### **Actions**

- 1) Ensure SAP system is fully implemented with all the information referenced in the procedure, is accessible to all relevant staff and staff are fully trained in the use of the SAP system.**
- 2) Ensure all pre-acceptance audits are completed and in date for all wastes accepted to site.**
- 3) Review management systems to link the pre-acceptance audits with the new SAP**

**system.**

**Incinerator Bottom Ash (IBA)**

Currently this waste is being removed from site under the non-hazardous EWC waste code of 19 02 12. As this is a mirror entry as per the Guidance on the Classification and Assessment of Waste (WM3), the site was requested to provide their basic waste characterisation assessment. Although some information has been provided on this, further evidence is required to fulfil the requirements of WM3 which has been requested. Further scores may be applied following a review of the information supplied.

CAR form NRW0044561 also needs to be viewed as this has further actions relating to the waste transfer station permit.

A more detailed hazardous waste audit report will follow alongside this CAR form.

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.