

Compliance Assessment Report

Report ID:
CAR_NRW0035864

This form will report compliance with your permit as determined by an NRW officer

Site	Bridgend Clinical Waste Treatment Plant and Transfer Station	Permit Ref	PP3430UL			
Operator/Permit holder	SRCL Limited					
Regime	Installations					
Date of assessment	04/10/2019	Time in	09:30	Out	12:00	
Assessment type	Audit					
Parts of the permit assessed	Storage areas, process and current issues					
Lead officer's name	Warrick, Linda					
Accompanied by	Griffiths, Toby					
Recipient's name/position	Steve Simms/ Site Manager	Date issued	24/10/2019			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Person(s) present

Stericycle (SRCL)	
Steve Simms	Site Manager, SRCL Bridgend
Marianna Hislop	Permit Compliance Manager
Natural Resources Wales	
Linda Warrick	Hazardous Waste Officer South West
Toby Griffiths	Senior Officer – Industry & Waste Regulation South Central

Site Description

SRCL Ltd operates a clinical waste treatment plant and waste transfer station at Brynmenin Industrial Estate, Bridgend. The site is part of the Stericycle Group and handles clinical (healthcare) waste from hospitals and other healthcare premises. SRCL Bridgend is permitted under the Environmental Permitting Regulations (EPR) to store and treat hazardous and non-hazardous waste types, subject to the limits and exclusions outlined in the permit.

Hazardous infectious clinical waste is stored then treated using heat disinfection within the alternative treatment "holoflite" unit. The disinfected residue or "floc" is loaded into trailers and then transferred off site for final recovery and/or disposal. Hazardous clinical waste and non-hazardous waste fractions which are unsuitable for treatment in the Alternative Treatment (AT) unit are stored and sorted for onward bulk transfer to other suitably authorised waste management facilities.

Over the last 18 months the wider UK clinical (healthcare) waste sector as a whole has been placed under strain following the failure of a company operating clinical waste collection and disposal in 2018. Stericycle has since taken on new customers from the group of clinical (healthcare) waste producers who were formerly contracted to this company.

This inspection forms part of the handover visit as a result of NRW's restructuring programme. Toby Griffiths is the new inspector taking over from Linda Warrick who has been the sites main contact since October 2015.

Storage Capacity

We assessed the hazardous and non-hazardous storage areas. At the time of the inspection, the Bridgend Installation was compliant with its permitted storage limits for hazardous, non-hazardous and residual waste.

As a result of the issues highlighted above there is considerable unsustainable pressure being placed on the UK's clinical waste treatment capacity, particularly for incineration. One visible symptom of this underlying issue is growing waste storage at contractor installations and healthcare (producer) facilities. Further storage of "incineration only" waste is only adding to the existing backlogs.

The site is currently within its storage capacity for hazardous waste of 101 tonnes. Current storage is approximately 83 tonnes of hazardous waste. SRCL are restricting the number of bins being used to 10 a day from the priority hospitals (The Heath, Morriston, Singleton) to try and manage input and flow of waste into the plant. The site is in discussions with the trust to palletise sharps bins to enable more waste to be moved in one collection. Steve Simms stated that they are often loading half empty 770 litre bins from hospital premises.

SRCL owns the adjacent building which has recently been discussed in terms of increased storage. NRW have stated that they would look at any application to vary the permit to include this facility. To date no application has been received.

NRW acknowledges that pressure remains on the sector and the situation could potentially escalate with the autumn/winter burdens placed on the NHS along with further incinerator issues across the country.

Treatment of non-pharmaceutical/medicinal sharps using AT.

Stericycle are exploring the option to process certain sharps waste streams (which are pre-segregated and do not contain cytotoxic/cytostatic medicines) using heat disinfection at AT plants. This approach is already followed in Scotland and is reflected in SEPA's published guidance.

The above proposal was discussed by SRCL during our visit and we acknowledge that it has the potential to reduce the growing backlog of clinical waste by diverting approx. 10% of UK clinical waste away from incinerators. However, some environmental considerations would need to be satisfied first to ensure there is no increased risk from AT plants e.g. Bridgend.

- A trial would be needed with defined parameters and timescales.
- Air and effluent emissions from AT plants would require testing to show that processing of sharps does not present an unacceptable environmental risk.
- Additional abatement measures (e.g. filtration) as necessary
- Robust waste pre-acceptance measures would need to be in place for sharps waste streams. Stericycle already provide a 'Biosystems' service where separate, coloured sharps containers are provided by the contractor on behalf of the customer. These containers are both washable and reusable. The service can be managed by Stericycle or self-managed by the waste producer.
- The 'floc' or residue from AT (sharps) waste is normally baled and used as a fuel in energy from waste plants. This floc would need re-assessment to ensure there are no insurmountable handling or processing issues at destination sites.
- Consideration should be given to any previous regulatory position in respect of sharps waste, as well as the assessment made in Scotland, to help the EA and/or NRW review this proposal. **[Action 1]**

Bio-systems

There is a growing uptake of the Biosystems service for sharps among NHS Trusts in England.

- In Wales, Stericycle has encountered a reluctance from the NHS All Wales Consortium (AWC) to adopt its Biosystems service. This is believed to be on grounds of cost and the visibility of benefits/savings within individual NHS Trusts. Where the benefit for less purchase of single use containers could not be factored into the cost savings.
- Some private healthcare providers in Wales already use the Biosystems service.
- The managed Biosystems option offers a way of addressing concerns about sharps waste pre-acceptance and segregation.
- Other clinical waste contractors e.g. Tradebe with facilities in Wales would also benefit from permission to treat certain sharps waste streams using AT plants.

Floc

SRCL stated that the residual Floc is currently being transferred to Atlantic in Cardiff for further treatment. It then goes to Aberthaw Cement Works to be used as a fuel.

If the proposal to treat medicinally contaminated sharps in the AT plant at Bridgend goes ahead, the Floc would then potentially go to the Viridor site at Trident Park in Cardiff as fuel.

Monitoring

A variation is to be requested to bring the permit monitoring requirements and frequency in line with EPR5 .07.

Conclusion

The site is well managed and no amenity issues were noted during this inspection.

Actions:

1. Please write to NRW with any requests for trialling changes to the processes on site. This should include full details of the proposal to allow NRW to review the request.

EPR Compliance Assessment Report

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.