

**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           | 29/05/2020   | Time in     | N/A        | Out | N/A |
| Assessment type              | Report/Data Review   |             |            |     |     |
| Parts of the permit assessed | Annual Returns   |             |            |     |     |
| Lead officer's name          | Griffiths, Toby  |             |            |     |     |
| Accompanied by               |  |             |            |     |     |
| Recipient's name/position    | S Simms/ General Manager                                     | Date issued | 29/05/2020 |     |     |

### 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 |
|--|--------------|-----------------------|
| B1 - Infrastructure - Engineering for prevention and control of emissions                                      | A            |                       |
| E1 - Emissions - Air   | A            |                       |
| E4 - Emissions - Sewer   | A            |                       |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment               | A            |                       |
|  | X            |                       |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | A            |                       |

**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.

|                                    |          |   |          |
|------------------------------------|----------|---|----------|
| <b>Number of breaches recorded</b> | <b>0</b> | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | <b>0</b> |
|------------------------------------|----------|---|----------|

**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

### Annual Returns 2019 and recent reports

A small fire at the plant was reported on the 26th April affecting the boiler and associated flue stack. A Schedule 5 Part A form was submitted on the 27th April and a Part B on the 29th. There was minimal damage and the root cause has been identified as a failed motor causing surplus gas to be used which ignited. The damage has been rectified and a proposal to upgrade the arrangements to include a thermostat sensor in the flue stack. This will be followed up by NRW in due course.

### Covid-19

The site was reported to remain in operation with no significant issues.

### Permit variation

NRW issued a permit variation on 19/03/2020 which added a new waste code (15 02 02\*) to the permit. This enabled the site to store and treat wastes under European Waste Code 15 02 02\*. The variation was required to complement the contingency work Public Health Wales are undertaking in relation to waste produced during the deep cleansing of people and properties in a non-healthcare setting where possible cases of COVID 19 have been present.

### Annual Returns

The document was received on 27th January 2020, which included:

- Permit Condition 4.2.2, 4.2.3
- Annual emissions monitoring (Table S4.1)
- Waste treatment tonnage (Table S4.2)
- Water and energy use (Table S4.3)
- Sewer discharge (S1)
- Table S3.4 requirements were included and were compliant (\*). As noted in the report, the requirements of Table S3.1 have been requested to be amended and potentially removed from the permit (Ref: CAR\_NRW0034971). NRW will follow this up in relation to alterations to the permit with reference to EPR5.07 Guidance for Clinical Waste. The applicability of MCERTS to the monitoring method employed, will also be reviewed.

\* Subject to the points noted above, the reports were considered compliant with permit conditions, although it was noted that monitoring was not undertaken due to rainfall for the following parameter: *"Surface – sample point >10m from the treatment plant"*

**Action:** Please confirm whether an alternative sample date was arranged for this.

### Waste Returns

Received:

April – June 2019

July - September 2019

October - December 2019

END

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036640**

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|                        |  |            |            |
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| Operator/Permit holder | SRCL Limited   | Date       | 29/05/2020 |

### 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 |              |  |            |
| G1                  | X            | <p>It was noted that monitoring was not undertaken due to rainfall for the following parameter:</p> <p>“Surface – sample point &gt;10m from the treatment plant”</p> <p>Please confirm whether an alternative sample date was arranged for this.</p> | 11/06/2020 |

## 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](mailto: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.