

Compliance Assessment Report CAR_NRW0037119

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 carried out: Site Inspection, Reason: Routine.

On 30/09/2020 between 10:00 and 15:00.

Parts of permit assessed: Various

NRW Lead Officer: Rebecca Harwood, accompanied by Lara Cubley.

Report sent to: Janine Scott, Site Manager on 11/11/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	C3 Minor	Condition 2.2.1
E1 - Emissions - Air	Action only (X)	
C1 - General Management - Staff competency/training	C3 Minor	Condition 2.3.5
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	Ongoing (O)	Conditions 2.3.6
C3 - General Management - Materials acceptance	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3 Minor	Condition 1.5
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Action only (X)	

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

Total number of non-compliances recorded	Total non-compliance score
3	12

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
B1	see Action 1 below	31/12/2020
E1	see Actions 2, 3 and 4 below	30/11/2020
C1	see Actions 5 and 6 below	30/11/2020

Criteria	Action needed	Complete by
G3	see Actions 7 and 8 below	31/12/2020
C3	see Action 9 below	31/01/2021
B3	see Actions 10 and 11 below	31/12/2020
G4	see Action 12 below	Already completed

Action 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 routine inspection of the site undertaken on 30 September 2020 by Regulatory Officers Lara Cubley and Rebecca Harwood.

The Site Manager, Plant Manager and SHEQ Manager were on site at the time of the visit. Other members of Tradebe staff assisted with providing information.

This report summarises any relevant observations, actions and non-compliance observed on the day and reviews the supplementary information provided following the visit.

Site visit

The Plant Manager provided a tour of both the HDU and Incineration plants. Site schematics have been sent through to NRW.

All bins are weighed individually as they arrive, and the tare weight of the bin used to calculate the volume of waste. All bins are bar coded.

During the visit smoke was seen emitting from the entrance to the kiln. This smoke was escaping and not captured by the kiln feed hood, it was therefore rising up into the building. Condition 2.2.1.2 states that *there shall be no point source emissions other than those listed in Table 2.2.1*. An emission from this point is not authorised and should be contained in the kiln feed hood which is then routed via abatement.

This is a breach of condition 2.2.1 and attracts a CCS3 score.

Action 1: The Operator shall submit proposals, with timescales, for ensuring such emissions are dealt with appropriately by 31/12/20.

TOC results

TOC results from the IBA have been consistently at 0.1% or <0.1% - this trend is being looked at by the Operator and reviewed against similar plants. The Operator confirmed at the visit that the laboratory is the same and the testing techniques have not altered. See CAR NRW0036923 for actions.

Mercury Breach

Following the mercury breach in February (as reported on CAR NRW0036923), routine CEMS monitoring was undertaken from 22nd – 25th September 2020 – results are pending. A report into the event has not been undertaken, although the Operator has confirmed that there was a review of waste streams prior to the monitoring with no anomalies found.

Action 2: Please forward latest biannual CEMS results to NRW as soon as they are received.

Action 3: Please undertake a thorough internal investigation into the breach in February and report back on findings by 30/11/2020.

Action 4: Please provide your internal procedure for reviewing non-conformance/non-compliance, such as a breach of emissions by 30/11/2020.

Weekly weighing of carbon was introduced previously following a mercury breach in 2014/15, however, it appears that this has become monthly.

Checks for the carbon dosing were being undertaken and recorded on the 2 hr inspection sheets and the daily / weekly / monthly check sheets. These were viewed at site and subsequently emailed.

The Operator subsequently confirmed that the carbon dosing system is on a feed screw that is on a permanent 12hertz delivering 2.5kgs of carbon per hour. The maintenance team carry out a regular check of this amount - see comments above.

Reviewing the data supplied from February, March and April 2020 the following observations have been made:

- *weekly cleaning of internal cone on venturi carbon feed:* this appears not to have been completed on a number of occasions.
- *monthly check of dosing weight:* 3rd February - 2.64kg/hr; 24th February - 2.28g kg/hr; 27th April - 2.46kg/hr. No records for March.
- *monthly replacement of venturis and check inlet to reactor tower:* 10th Feb – 0 recorded; 30th March, 6th April & 27th April – not replaced.

- *monthly check function and rotary vales and look for leaks:* 5th Feb – 0 recorded; 4th March – no leaks rotary valve in good working order; 1st April – all okay.

This is a breach of Condition 2.3.5 (Maintenance) and attracts a CCS3 score.

Action 5: Please supply your carbon dosing procedure by 30/11/2020.

Action 6: Planned preventative Maintenance schedules for environmentally critical equipment such as abatement must be followed and recorded to reduce the risk to the environment and secure compliance with permit conditions. This must be reviewed and implemented with immediate effect.

HCl / CO emissions

CAR_NRW0036923 also noted spikes of HCl / CO. The Operator confirmed that lime dosing is automated. The dosing system is connecting and monitoring the RAW data, when it rises it triggers an inverter to increase the hertz that then drives the lime feed screw to deliver more lime. The level for HCl is set at 8.5mg/m³, when emissions are greater than this the screw speed will increase to add more lime in order to remain under the Emission Limit Value (ELV) for HCl of 10mg/m³.

Emergency Relief Vent (ERV)

The ERV became operational on 18/07/2020 and was reported through to NRW. Having reviewed the records of the night shift (17/07/2020) this incident was as a result of the boiler tripping.

IBA disposal

The Operator confirmed that IBA from the incineration plant is put through a water bath and regular temperature checks are undertaken before the IBA is removed off site to Hafod Landfill.

Fire Incident 16 November 2019 – outstanding actions

The Operator undertook an investigation into the fire which resulted in several actions that have been completed, including conducting a root cause investigation. It is thought that the fire was started by either a transformer or welder.

Although an asset register / Planned Preventative Maintenance (PPM) schedule is currently being introduced this has not been completed. There was no process to ensure that any new plant or kit was added to the register.

Action 7: The Operator should complete and implement the asset register by

31/12/2020

Action 8: The Operator should develop a procedure to ensure new plant bought onto site is captured in the asset register and tracked for PPM. This should be submitted to NRW in writing by 31/12/2020.

The Operator stated that PAT testing is due in December and that the fixed wiring testing was completed during September's shutdown.

The Operator reports that they have requested a visit from the North Wales Fire and Rescue Service, but they have not yet been to visit the site.

Pre Acceptance Audits (PAA)

As per the Regulatory Decision communicated to the Operator on 3rd July 2020, we expected expired audits to be planned and undertaken between July and September 2020 and submitted to their waste operator no later than 31 October 2020. Desktop audits for COVID-19 areas will be accepted to demonstrate compliance.

The Operator presented a spreadsheet used for tracking PAAs. According to the spreadsheet the most recent PAA was conducted in February 2020 - Fairfield Independent, prior to the Covid-19 lockdown.

We looked at the electronic record of the PAA for Borders General Hospital which was reportedly conducted on 16th & 25th April 2019. More than 5 tonnes per year is accepted from this producer. In accordance with Sector Guidance EPR 5.07 Clinical Waste, this would require a PAA frequency of a minimum of 12 months. The Operator provided an electronic copy of the Customer Audit Declaration conducted on 21st March 2019 following the audit.

The Operator reports that the greatest input of waste to the installation currently comes from Lancashire Teaching Hospital (>5 tonnes/yr) and their tracking spreadsheet confirms the last PPA was undertaken in April 2019.

Advice and Guidance: Pre Acceptance Audits should be undertaken in accordance with Sector Guidance EPR 5.07 Clinical Waste.

Action 9: Complete all PAA by January 2021 and provide updated tracking spreadsheets to demonstrate this to NRW by 31/01/2021.

Drainage Plans

The office portacabin has moved from its previous location following the previous visit where concerns were raised (CAR_NRW0036261). However, it does not appear on the updated drainage plan, e.g. where is the foul sewer connection. A new area of hardstanding has been constructed in front of this office area in use for car parking. Any

drainage amendments from this area should also be added to the drainage plans.

Condition 1.5 refers to Minor Operational Changes. NRW were not informed of the amendments and therefore a CCS3 score has been applied.

Action 10: The Operator is to submit an updated drainage plan to NRW by 31/12/2020 to include changes associated with the connection of the newly moved office to sewer and any addition drainage associated with the new car parking area.

Action 11: The Operator must review procedures for changes which could impact on the environment to ensure appropriate controls are put in place and that procedures are followed. A summary of this review should be provided to NRW together with a copy of control procedures employed by 31/12/2020.

BREF review

NRW confirmed that there was a delay to the BREF review being undertaken and Reg 61 questions are likely to be submitted to the Operator in April 2021, with completion of consolidated and reissued permits in November 2022.

Monitoring returns

The permit requires monthly submissions of CEMs data and monthly TOC results from the Bottom Ash, Table S2, Schedule 2, to NRW. However, in line with the majority of permits, NRW are happy to receive these particular returns on a quarterly basis going forward.

The Operator is reminded that any breach of emissions limits must still be reported as per Condition 5 and Schedule 1 of the permit.

Action 12: Monitoring returns to be submitted quarterly.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.