

Compliance Assessment Report CAR_NRW0037576

Permit being assessed: WP3636ZG.

For: Wrexham Clinical Waste Treatment Facility (HDU & TS), held by Tradebe Healthcare National Limited

At: Tradebe Healthcare HDU & TS, Marlborough Road, Wrexham Industrial Estate, Wrexham, Wrexham, LL13 9RJ.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 30/12/2020.

Parts of permit assessed: Annual Performance / Q3 & Q4 monitoring returns

NRW Lead Officer: Rebecca Harwood.

Report sent to: Janine Scott, Site Manager on 12/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
H1 - Resource Efficiency - Efficient use of raw materials	Action only (X)	
E1 - Emissions - Air	C3 Minor	Condition 3.1.2
C2 - General Management - Management system and operating procedures	C3 Minor	Condition 1.1.1
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	

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

Total number of 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
H1	Please review performance reports to address queries highlighted.	31/03/2021
E1	Retest and forward results when received.	31/03/2021
C2	Improve system checks	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

1. Annual performance reporting

Condition 4.2.2 of the permit requires a report on the performance of the permitted activities over the previous year to be submitted. This report was received on the 5th February 2021.

Annual water, energy, waste and performance parameter data for the HDU was reviewed and is summarised below:

WUI - Water usage decreased which reflects reduction in tonnage throughput. **Water per unit output to be updated.**

E1 – Energy use has decreased alongside CO2 produced reflecting the reduction in tonnage throughput. **CO2 produced per unit output to be updated.**

RI – Waste Flock tonnages remain similar to 2019 despite overall waste arisings from site, and tonnage throughput being significantly less than 2019. **Confirmation of figures required. Waste per unit output to be updated.**

P1 – noted that new boiler installed June 2020 so only half year figures as first half of the year was included in incinerator return.

Action 1: Please review performance reports to address queries highlighted above by 31.03.2021.

Emissions to air – emissions are monitored quarterly and results submitted annually. Monitoring is undertaken as required by Condition 3.5.1 and emission levels are set by Condition 3.1.2 and Schedule 3 Table S3.1.

Monitoring data for all quarters was submitted on 10th February 2021. Q1-3 results were within the ELVs. Elevated levels of total aerobic bacteria and total coliform bacteria were

observed in monitoring points A1 and A2 during Q4 monitoring, undertaken on 11th December 2020.

The emissions reported against A1 were 2850cfu/m³ for total aerobic bacteria and 1100cfu/m³ total coliform bacteria and for A2 were 2850cfu/m³ for total aerobic bacteria and 870cfu/m³ total coliform bacteria. The emission limits set within the Permit are 1000cfu/m³ for total aerobic bacteria and 300 cfu/m³ for total coliform bacteria. **This emission breach has been scored a CCS3 against Condition 3.1.2.**

Action 2: Retest and forward results when received.

A Schedule 5 notification was submitted on 14th January in accordance with Condition 4.3.1 to notify NRW of this breach. An investigation has been undertaken to understand the cause of the breach and work to rectify the issue completed, with a retest being scheduled for February 2021. The investigation identified that the HEPA filters had become wet and subsequently blocked as a result of the cooling pump failing. Processes and further checks have been introduced to prevent a similar incident occurring, with responsibility for the checks being transferred to the maintenance department. There has been a failure to undertake checks to ensure all component parts were working correctly which resulted in an emissions failure and the issue only identified once the results were received. **This has been scored a CCS3 breach of Permit against Condition 1.1.1 General Management.**

Action 3 (completed): Improve system checks.

2. Review of quarterly monitoring returns

Condition 4.2.3 requires that a report on emissions over the previous quarter shall be submitted within 28 days of the end of the reporting period. Monitoring was undertaken in accordance with Condition 3.5.1.

Quarter 3 (July - September 2020) returns were received on 13th October 2020. Quarter 4 (October - December 2020) were received on 5th February 2021.

Emissions to sewer July – December 2020 - no issues with data.

Efficacy data submitted shows pass for all months in Q3 and Q4 2020.

3. Waste returns

Condition 4.2.2 requires that quarterly waste returns for the previous quarter shall be submitted within one month of the end of the reporting period.

Waste returns were submitted for all quarters and reporting issues within the spreadsheet submissions are being worked through.

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.