

Compliance Assessment Report CAR_NRW0037577

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: 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 26/02/2021.

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)	
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	
E5 - Emissions - Waste	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
E1 - Emissions - Air	Action only (X)	
E1 - Emissions - Air	C3 Minor	Condition 2.2.1.3
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	Action only (X)	
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
1	4

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	31/03/2021

Criteria	Action needed	Complete by
	highlighted.	
E5	Review results against historic trends and confirm results are representative of the Bottom Ash and APV Residues for Q3 and Q4.	31/03/2021
C2	Please provide your quality assurance process for reviewing and validating monitoring results.	31/03/2021
E1	Review CEMS data to confirm VOC emission results as noted on the Schedule Notification and investigate the anomaly in reporting.	31/03/2021
E1	Retest	Already completed
G1	Review the CEMS data and continue your investigations into the elevated SO2 readings.	31/03/2021
G3	Please forward the AST in accordance with Condition 2.10.3.	31/03/2021
G4	Submit Annual Improvement Targets Report in accordance with Condition 4.1.6.	31/03/2021

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 4.1.3 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 Incinerator has been reviewed and is summarised below:

WUI - Water usage increased slightly compared with 2019, specific usage remained as 2019. **Confirmation needed regarding specific usage figure. Water per unit output to be updated.**

E1 – Energy use has decreased slightly, likely linked to the use of Heliex. **CO2 produced**

per unit output to be updated.

RI – APC residue tonnage is similar to 2019, however Bottom Ash tonnages have halved but input tonnage remains similar to 2019. **Confirmation on tonnage needed. Waste per unit output to be updated.**

P1 – Energy imported has reduced as a result of Heliex. Lime consumption has decreased substantially since 2019. A reduction in Mass of Bottom Ash is linked to the waste query above. All other parameters are consistent with 2019.

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

2. Review of quarterly monitoring returns

Condition 4.1.2.4 requires that a report on emissions over the previous quarter shall be submitted within 28 days of the end of the reporting period.

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

2.1 Bottom Ash & APC monitoring

Monitoring was undertaken in accordance with Conditions 2.2.8.1 and 2.6.6. Ash composition for both Quarter 3 and Quarter 4 shows composition below the 3% TOC limit. The results remain at 0.1% Carbon and the Operator confirmed that a change in testing methodology had occurred during the first quarter of 2020.

Having reviewed the data for both Q3 and Q4, further interpretative analysis of the data is required by the Operator. Although no ELVs are set for the emissions, the results for Bottom Ash in Q4 show high levels of Mercury, Chromium and Vanadium, along with a spike of Arsenic. Antimony, Lead, Copper, Manganese, Nickel, Cobalt and Zinc all showed significantly lower results compared with previous quarters. The results for the APC residues in Q4 showed high levels of Thallium, Mercury, Chromium and Vanadium. Antimony, Cadmium, Lead, Copper, Manganese, Nickel, Cobalt and Zinc all showed significantly lower results compared with previous quarters. The Dioxin results for Q2, Q3 and Q4 also need further review.

Action 2: Review results against historic trends and confirm results are representative of the Bottom Ash and APC Residues for Q3 and Q4. Report back findings to NRW by 31.03.2021.

Action 3: Please provide your quality assurance process for reviewing and validating monitoring results by 31.03.2021.

2.2 Emissions to Air

Condition 2.2.1.3 states the limits for emissions to air for the parameters and emission points set out in Table 2.2.2 shall not be exceeded except during a period of abnormal operation.

CEMS Data

CEMS monitoring was undertaken from stack A1 for Particulate Matter, VOC, Hydrogen Chloride, Carbon Monoxide, Sulphur Dioxide and Oxides of Nitrogen. There were no breaches of emissions for Q3 or Q4 2020 identified in the submitted data.

A Schedule 1 Notification was received on 28th August 2020 after elevated VOC emissions were detected following the CEMS unit service on 24th September 2020. The notification states *the first half hour result was 45 mg/m³, lowering to 18.3mg/m³ at the end of the 3 hours*. The CEMS data itself for the 24th August shows a maximum half hour result of 19.3mg/m³. There appears to be some inconsistencies with the data and reporting.

Action 4: Review CEMS data to confirm VOC emission results as noted on the Schedule Notification and investigate the anomaly in reporting. Report back to NRW by 31.03.2021.

Bi- annual Monitoring (July - December 2020)

Condition 2.2.1.3 requires that emissions to air will not exceed levels set out in Table 2.2.2. Bi- annual monitoring from emission point A1 was undertaken in September. High levels of SO₂ were recorded - 659mg/m³ against a limit of 200mg/m³. All other results were below permitted ELV's. A Schedule 1 notification was received on 22.01.2021 following discussions between the Operator and NRW. **A CCS3 score has been applied, against Condition 2.2.1.3 for this breach. A retest was undertaken on 7th December and the results were compliant.**

Action 5 (completed): Retest.

Whilst reviewing the CEMS data for September, specifically the SO₂ results from 23rd September when the breach of emissions occurred, there is no evidence that SO₂ half hourly averages were abnormal. The highest half hourly average for that day is 7.82mg/m³ with the mean half hourly average being 23.2mg/m³. There are also no invalid results recorded.

Action 6: Review the CEMS data and continue your investigations into the elevated SO₂ readings.

Condition 2.10.3 states that where CEMS are installed the Operator shall perform an Annual Surveillance Test (AST) at least annually.

Action 7: Please forward the AST for 2020 by 31.03.2021.

3. Operations

A notification was received in accordance with Condition 5.1.1.6 that the Emergency Relief Vent was opened for 4 hours and 20 minutes on 7th November 2020 due to a power cut at Wrexham Industrial estate. No further action.

4. Reporting

Condition 4.1.6 requires the Operator to provide a summary report of the previous years progress against the EMS targets set.

Action 8: Submit Annual Improvement Targets Report by 31.03.2021.

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.