

Compliance Assessment Report CAR_NRW0038819

Permit being assessed: PP3430UL.

For: Bridgend Clinical Waste Treatment Plant and Transfer Station, held by SRCL Limited
At: S R C L Ltd, Unit 12, Aneurin Bevan Avenue, Brynmenyn Industrial Estate, Brynmenyn,
Bridgend, Bridgend, CF32 9SZ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 18/06/2021 between 11:00 and 13:00.

Parts of permit assessed: Site storage and activities

NRW Lead Officer: Mostyn Wall, accompanied by Eleanor Davies.

Report sent to: Marianna Hislop, Permit Compliance Manager (South) on 13/10/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E2 - Emissions - Land and groundwater	C3 Minor	3.2.1

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
E2	Update the EMS and training documents to include an extra check so that no loose material can escape from the trailer and that no floc is trapped between the cover and the trailer. Send a copy of the EMS file with the updated procedures to NRW.	31/10/2021

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.

At this time, we do not intend to take any further action.

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

Site Visit 18th June 2021

Mostyn Wall and Eleanor Davies from NRW attended a site tour of the SRCL Bridgend clinical waste treatment facility.

The purpose of the visit was to get a introductory site tour and overview of the operations at the facility.

Stephen Sims gave historical overview of the site and the impact of the COVID pandemic. The pandemic has created a lot more clinical waste and has resulted in an increase in volume. This is due to the lightweight nature of the extra PPE and results in more trucks being used to transport the waste.

Stephen Sims described how the hospitals are not sorting the waste correctly at the source leading to problems at the site. SRCL reports any incorrectly bagged waste back to the NHS and is logged on the internal system.

Site tour

A site tour was given showing the activities at the installation. No foul odours were identified outside the building.

A new conveyor belt was planned to be installed at the site. The new conveyor belt is used for carrying the floc from the holoflite screw to the trailers, this will make the system enclosed and result in less floc falling off the conveyor belt onto the floor.

The 2nd floor area was split into a maintenance area and storage. The maintenance area stores spare parts for the installation. Parts can also be moved around the business from other sites if a problem occurs. The storage area contained 148 pallets and was rather full. The build-up of pharmaceutical waste was caused by the temporary shut -down of the Viridor incinerator in Cardiff.

Outside storage has a number of trailers filled for onward transfer (sharps, Incineration wastes, Pharma etc) or during high inbound waste periods the orange bagged waste suitable for alternative treatment will be loaded onto a trailer, where it can either be transferred off-site for disposal or recovery or unloaded and processed at the facility when the waste volumes are lower.

The compactor is located outside and is a leak and odour proof sealed compactor. No smells or liquids could be seen around the compactor. The sites Permit allows SRCL to accept and store the waste prior to treatment, the compaction is an auxiliary activity in a sealed skip. The compaction of waste was agreed by NRW in 2011 after a trial by SRCL. Offensive waste (18 01 04) is compacted to make the waste easier to store and collect for its disposal elsewhere. This follows the Welsh health Technical memorandum 07-01 and the EPR 5.07 guidance for clinical waste.

The perimeter fence had an open area where floc or waste can be blown off the permitted site into the adjacent buildings and public road. The site has addressed this problem by fitting netting to cover the gaps and stop waste leaving the facility. The site confirmed the netting by sending photographic documentation on the 21/06/2021.

Floc spill on the 17th June 2021

A schedule 5 notification part A was sent into NRW on the 18th June for a fugitive spill of floc. The part B was sent in on the 21st June.

Floc is placed into a trailer before being driven offsite. A cover was placed over the floc and trailer by the driver but did not notice overfilled flock at the rear of the truck that subsequently got between the outside of trailer and cover. While driving the truck out of the site, the loose flock between the trailer and cover escaped onto the road. The area of spillage was from the SRCL site up to the nearby roundabout.

Escaped flock was noticed by Stephen Simms and he then sent out the entire staff to tidy up the floc from the roadside outside the installation right up to the roundabout. The floc was collected and brought back to the site for disposal. The council arrived on the 19th to clean the streets with a road sweeper. The spilled floc was estimated to be less than 50 L by SRCL.

The schedule 5 part B records the measures taken by SRCL to prevent a recurrence of this incident. SRCL has added an extra check to ensure that the waste is contained prior to removal from the site and this new check is being trained to the site personnel. NRW approves of this new check as it will identify any loose floc on the trailer before being driven offsite.

The fugitive emission release of floc is a category 3 non-compliance of permit condition 3.2.1 that is seen by NRW to have a minor environmental effect.

Action. Update the EMS and training documents to include an extra check so that no loose material can escape from the trailer and that no floc is trapped between the cover and the trailer. Send a copy of the EMS file with the updated procedures to NRW.

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.