

Compliance Assessment Report CAR_NRW0039277

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 30/12/2021.

Parts of permit assessed: Q4 and annual monitoring returns

NRW Lead Officer: Rebecca Harwood.

Report sent to: Helder Daravano, Operations Director on 16/02/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	4.3.2
B5 - Infrastructure - Plant and equipment	Action only (X)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	4.2.3
E1 - Emissions - Air	C3 Minor	Condition 3.1.2
E1 - Emissions - Air	C3 Minor	Condition 3.1.2
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
H1 - Resource Efficiency - Efficient use of raw materials	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
4	8.2

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
G4	See Action 1 below	28/02/2022
B5	see Action 2 below	11/03/2022

Criteria	Action needed	Complete by
G4	see Action 3 below	28/02/2022
E1	see Actions 4 & 5 below	11/03/2022
E1	See Actions 4 & 5 below	11/03/2022
G1	see Action 6 below	11/03/2022

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 the submission of the Q4 returns and 2021 annual performance data.

1. 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. Quarter 4 (October - December 2021) returns were received on 31 January 2022.

Monitoring was undertaken in accordance with Condition 3.5.1.

Emissions to sewer October – December 2021 - flow readings provided.

Efficacy October – December 2021 - October fail (see below), November / December pass.

2. Efficacy

A Schedule 5 Notification was submitted to NRW on 31 January 2022 following an efficacy failure during Octobers routine monitoring. **Due to the delay in submitting the Schedule 5 notification this has been score a CCS4 breach of Condition 4.3.2.**

Action 1: Review reporting procedures and ensure that all notifications relating to the facility are reported in accordance with Section 4.3 of the permit.

The testing was undertaken on 15 October 2021 and the Operator received the results on 20 October 2021. The Operator has stated that following notification of the efficacy failure the floc was held onsite and reprocessed when the plant restarted. Floc produced during

the investigation into the efficacy failure and the validation of the process was also held onsite until the results of the November efficacy and validation test were received.

The investigation identified that:

- No. 1 hot oil screw shaft was found to be defective and replaced.
- Suspected oil flow issue resolved by cleaning and desludging the oil tank.
- The pin hole leak in no. 2 hot oil screw leak was repaired.
- Lagging was replaced
- Temperature probe calibration checked and ok.

Further information is required to understand the root cause of the failure.

Action 2: Please provide the following information by 11.03.2022:

- maintenance records for the HDU, including the maintenance schedule, last routine maintenance checks, frequency of checks, procedures relating to maintenance checks.
- your procedure relating to efficacy failure.
- confirm how often the trailer of floc leaves site.

NRW will assess whether there have been any permit breaches following a review of this information.

3. Air emissions monitoring

Emissions to air 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.

Air emissions monitoring data from A1 and A2 for 2021 has not been received by NRW. This has been scored a CCS4 breach of Condition 4.2.3 - failure to submit.

Action 3: Please submit the 2021 data by 28.02.2022.

A Schedule 5 Notification was received on 13 January 2022 following a breach of ELVs during the Q4 emissions to air monitoring undertaken on 15 December 2021. This was submitted in accordance with Condition 4.3.1. Elevated levels of total aerobic bacteria were recorded in monitoring points A1 and A2. The emission limit set within the Permit is 1000cfu/m³.

The emissions reported against A1 were 2660cfu/m³. This emission breach has been scored a CCS3 against Condition 3.1.2.

The emissions reported against A2 were 1060cfu/m³. This emission breach has been scored a CCS3 against Condition 3.1.2.

The Schedule 5 Notification states that immediate actions were:

1. Maintenance team to thoroughly clean the ductwork, in particular the exit grilles.
2. Re-inspect HEPA filters and filter housings.
3. Arrange for retesting of the microbial monitoring of shredder extract unit and HDU extract system to confirm emission limits are not exceeded.

Action 4: Forward retest results when received.

Action 5: Provide NRW with an update into the investigation and any possible causes for the emission breaches by 11.03.2022.

3. Annual performance reporting

Condition 4.2.2 (b) & (c) 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 28 January 2022.

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

WUI - Water usage decreased which reflects a reduction in tonnage throughput.

E1 – Energy use has increased resulting in an increase of CO2 being produced. These figures more accurately reflect the plants operation following new meters being installed mid 2020.

RI – Waste Floc tonnages have reduced compared with the last couple of years, but waste per unit output remains similar.

P1 – Total waste treated stated as 3202.5t. The quarterly performance returns (waste treated as detailed on the efficacy reports) have recorded tonnages as Q1 1209.6t, Q2 850.106t, Q3 787.6t and Q4 553.3t, totalling 3400.6t

Action 6: Investigate the discrepancies in tonnages and report back to NRW by 11.03.2022.

4. Waste returns

Condition 4.2.5 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.

The Operator should note that as a result of the BRef review an updated permit was issued during 2021 and the monitoring and reporting requirements for the permit change on 17 August 2022.

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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.