

17th March 2022

FAO Rebecca Harwood

CAR_NRW0039308

Permit reference WP3636ZG Tradebe Healthcare National Limited, Wrexham.

Dear Rebecca

Detailed below are the responses to the actions detailed in CAR NRW0039308

Action 1: Explain why there is steam being emitted from the HDU, confirm what the emission is and what it is likely to contain and report back to NRW by 31.03.2022.

Response

The HC Engineering Manager has confirmed that steam emitting from the HDU is partially from the moisture within the waste itself and from the additional steam injected at the waste entry point to heat the waste quickly and increase the efficiency of the disinfection process. Routine efficacy tests confirm that a log 6 kill is being achieved.

Tradebe intend to install a steam flow meter so that the steam flow can be controlled more accurately, with the potential to reduce or eliminate the excess vapour.

Typically steam from alternative treatment disinfection processes contain contaminants from the disinfected waste such as bioaersols, VOC and ammonia.

Action 2: Please provide details of any plans and timescales for improvement / upgrade / replacement works relating to the HDU to NRW by 31.03.2022.

Response – in progress

The HC Engineering Manager has circulated a draft CAF for the overhaul of the HDU. Comments from interested parties are in progress of being collated and will be reviewed. The likely timescale from approval of that CAF to remedy the various deficiencies in the system would be approximately 16 weeks.

Action 3: Investigate the cause of the leak, where the pipe drains from / to and how long it had been going on. Confirm what systems have been put in place to avoid a repeat occurrence. Report back to NRW by 18.03.2022.

Response

The Engineering Supervisor confirmed that the leak happened a few minutes before it was detected by the site manager as they accompanied NRW on a site visit on 19/1/22. The liquid spraying into the air was water from a steam condensing vessel on the HDS plant. The reason the pipe failed is because the pipe got hot. An immediate repair was carried out to the cooling system on 19th January 22. The cooling system was replaced on 10th February 22 with an improved system that ensures the water from the steam condensing vessel runs cold.

Action 4: Provide the daily check sheets for the 18 and 19 January 2022.

Response

HDU Shift reports attached separately. (DOC160322-16032022145235)

Action 5: Please provide your procedures for waste handling and storage and how you ensure that waste tonnages do not exceed those stated in Condition 2.3.3 by 18.03.2022.

Response

Daily bin counts are completed and reported at the morning meeting to enable planning for the day and night shift.

Waste Storage procedure will be attached (THC WRX 001 Waste Storage Procedure).

Action 6: Demonstrate the amount of waste that was on site on 19 January, including loads in, loads treated and loads transferred by 18.03.2022.

Response

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On 19th January 253 bins were received and 257 bins were treated (Receiving 19.01.2022 HDU & Treatment 19.01.22 HDU)

At the start of the shift there were 403 bins stored in the yard area and the area in front of the HDU that had been booked into the HDU permit awaiting processing.

Action 7: Please confirm what training is provided to staff about the storage of yellow bags and provide your internal investigation into this incident by 18.03.2022.

Response

Team leaders carry out on the job training, which will highlight that bagged waste requires to be stored inside wheeled bins. From site visits following the incident this appears to be an isolated incident.

Incident investigation will be attached (Incident Investigation Form – 190122).

Action 8: Review drainage plan and send an updated copy to NRW by 31.03.2022 with a clear explanation of both the internal and external drainage layout, including capacities of any bunded areas and underground storage.

Response – in progress

The Engineering Supervisor has provided an updated drainage plan, highlighting that the HTI bin wash drains to foul sewer. Also confirmed that there are no underground storage tanks. Updated drainage plan will be attached (04.01.21 (Site Drainage System)-Model).

Action 9 (completed): Ensure bins are not located above the penstock valve and that there is clear access to the penstock. This should be implemented immediately. It is noted that this work has been completed following a site visit on 17 February 2022.

Action 10: Provide confirmation of how the emptying of the tank is managed, when the penstock is opened and how suitability for discharge is assessed. Provide details as to when the tank has been emptied (via penstock or tanker) in the last two years. Please also forward your spillage procedure. Report back to NRW by 31.03.2022.

Response

The Engineering Supervisor confirmed there are no underground storage tanks. Enviroclear visited site in March to discuss drainage survey requirements. Enviroclear to confirm date to revisit site to carry out drainage survey.

Spillage procedure will be attached (SWP 9.1 EMR - Emergency Procedures - spillages and pollution incidents).

Action 11: Empty IBC storage bunds to allow adequate secondary containment by 18.03.2022.

Response

IBC storage bunds checked. Currently:

- the three single IBC bunds although containing rainwater have sufficient capacity to allow adequate secondary containment for the quantity of liquid stored in the IBCs.
- the double IBC bund contains debris/rainwater. The IBCs stored on this bund are full and require an empty bund.

All IBC bunds are being scheduled to be emptied (date to be confirmed as soon as Enviroclear confirm date).

Action 12: Provide procedures and daily check sheets that demonstrate IBCs are checked daily for leaks and spillages by 18.03.2022.

Response

Engineering Supervisor confirmed that IBC are checked for leaks as part of the PPMs. PPM checks sheets will be attached (PPM161221, PPM060122 & PPM040222)

Action 13: Please provide logs for December 2021 and January 2022 stating who was the CoTC holder on all days the facility was operational by 31.03.2022.

Response - In progress.

Action 14: Provide update on the outstanding actions above by 31.03.2022.

Response – In progress

The asset register is being updated.

Please do not hesitate to contact me if you require any further information

Yours sincerely

Ewan McLeod

SHEQ Manager