Cyfoeth Naturiol Cymru
Natural Resources Wales

Compliance Assessment Report CAR_NRW0039308

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: Site Inspection, Reason: Routine.
On 19/01/2022 between 12:55 and 15:45.
Parts of permit assessed: Various

NRW Lead Officer: Rebecca Harwood, accompanied by Julia Frost.
Report sent to: Helder Daravano, Operations Director on 09/03/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
B5 - Infrastructure - Plant and equipment	C3 Minor	Condition 3.1.1
C3 - General Management - Materials acceptance	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	Conditions 2.3.3 and 1.1.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
C2 - General Management - Management system and operating procedures	C3 Minor	Condition 1.1.1
B4 - Infrastructure - Containment of stored materials	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
3	12

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
B1	see Actions 1 & 2 below	31/03/2022
B5	see Action 3 below	18/03/2022
C3	see Action 5 below	18/03/2022
G2	see Actions 4, 6, 12 & 13 below	18/03/2022
C4	see Action 7 below	18/03/2022
B3	see Action 8 below	31/03/2022
C2	see Actions 9 & 10 below	31/03/2022
B4	see Action 11 below	18/03/2022
G4	se Action 14 below	31/03/2022

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 a routine site inspection of the HDU and Transfer Station on 19 January 2022. NRW Officers were accompanied by the Site Manager, SHEQ Manager and Engineering Manager.

The HDU plant itself is old and as mentioned on previous visits the lagging requires some attention. A constant emission of steam was observed coming from the end of the plant nearest the roller shutter doors.

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.

It was noted that the roller shutter doors are damaged and cannot be lowered, therefore this emission is not being contained within the building. Following the BAT review Officers do not believe the plant is operating to BAT. A review of the BAT submission and Improvement Conditions will be undertaken separately. The Operator stated that they are looking to upgrade the plant subject to financial approval.

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.

Whilst in the yard area it was noted that there was a liquid spraying up into the air behind a storage container and adjacent to the A1 and A2 emission points. **This has been scored a CCS3 breach of Condition 3.1.1 - unauthorised emission.**

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.

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

There were a large number of bins on site at the time of the inspection. It was difficult to know without looking at records how long the bins had been on site, which were empty, which were for the HDU, which were for the Incinerator and which were being transferred off site. The Operator should ensure that they are operating in accordance with Condition 2.3.3:

Maximum storage of 91.25 tonnes at any one time as follows:

- Area in front of the HDU: 125 x 770 litre carts = 6.25 tonnes
- Yard Area: 25 x 1500 litre carts = 2.5 tonnes
- Yard Area: 450 x 770 litre carts = 22.5 tonnes
- Yard Area: 15 trailers = 60 tonnes

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.

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.

A yellow clinical waste bag was seen on top of the trailer parked to the east of the site. **This is a CCS3 breach of Condition 2.3.3 and 1.1.1** as all waste should be stored in bins with closed lids except during loading and unloading and in accordance with *How to comply with your environmental permit Additional guidance for: Clinical waste (EPR 5.07)*Clinical waste (EPR 5.07) (cyfoethnaturiol.cymru) and *Healthcare waste: appropriate measures for permitted facilities* Waste storage, segregation and handling appropriate measures - Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

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.

Officers raised concerns over the lack of understanding by staff of the drainage network at the site. A review of the drainage plan dated 4/1/21 highlighted that this is incomplete as the incinerator bin wash is not marked on the plan.

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.

Due to the number of bins on site the penstock valve access was covered and the marked walkway was not kept clear. **This has been scored a CCS3 breach of 1.1.1 - non compliance with procedures.**

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.

The Operator stated that the penstock is routinely kept closed following a review of procedures in 2019. They also stated that the penstock has not been opened in 2 years. The Operator was unable to confirm the capacity of storage of effluent prior to the penstock.

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.

Advice & Guidance: Once a review of the site drainage has been completed, paint drainage manholes on site to identify surface water and foul sewer drains.

Concerns were raised by NRW officers regarding the IBC storage at the site both inside the building and outside adjacent to the site boundary. Although IBCs are stored on bunds this does not help if there is a leak to the side of the bund. In addition a number of the bunds for the IBCs stored outside contained liquid and therefore would not be able to contain the spill from the IBC if it were to leak. Condition 3.2.3 requires all liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment.

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

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

Condition 1.1.4 requires the Operator to comply with the requirements of an approved competance scheme.

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.

There are a couple of outstanding actions from previous visits / CAR forms that need closing out.

CAR NRW0037118 - Actions 2 & 3 - Asset register - please provide an update as to where the Operator has got to with the review and implementation of an asset register and revised procedure to ensure new plant brought onto site is captured and tracked for PPM.

CAR NRW0037118 Action 4 - Pre-Acceptance Audits - following on from previous visits, please provide an update as to whether these have been completed and an action plan for those that remain outstanding.

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

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.