

Compliance Assessment Report CAR_NRW0041780

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 25/04/2023 between 13:25 and 15:20.

Parts of permit assessed: various

NRW Lead Officer: Rebecca Harwood, accompanied by Kathryn Bradshaw.

Report sent to: Alan Rhodes, SHEQ Lead on 19/05/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	C3 Minor	Condition 1.1.1

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
B3	see text below	30/06/2023
C2	see text below	30/06/2023

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 undertaken at Wrexham HDU and Transfer Station on 25 April 2023. The SHEQ Officer and Site Manager were in attendance during the visit.

Drainage

At the time of the inspection it was noted that the drainage grates were uncovered. It was reported that water levels were being monitored and this was why they were uncovered. As stated in Action 2 of CAR NRW0041601 please ensure that you inform NRW when the procedure and use of the penstock changes, including demonstrating that procedures have been updated and staff trained on the use of the penstock prior to the change in operations.

The holes for the drainage channel adjacent to the floc skip, under the roller shutter door, appeared to be partially blocked. Regular maintenance of this area should be undertaken to ensure all liquid is diverted to the foul sewer via the bin wash.

Outstanding Action: A response remains outstanding in relation to Action 4 of CAR 0040331 linked to the integrity of bund under the floc skip. Please provide a response to this action by 30 June 2023.

Secondary containment

The IBC secondary containment bunds at the rear of the site had been emptied as required by CAR NRW0041601. It was noted that there was an IBC stored with its secondary containment on top of it adjacent to the quarantine area. After further investigation it appeared that this was empty and waiting to leave site. It was not possible to see the label to know what was previously within the IBC, and staff seemed unsure as to why it was there.

Advice and Guidance: Ensure empty IBCs are clearly labelled and identifiable when being stored ready for collection.

Storage of wastes

The quarantine area was hidden by bins and inaccessible at the time of the inspection, it is therefore unclear what would happen if a load arrived that needed to be quarantined.

Action 1: The Quarantine area should be cleared as soon as possible and maintained in order that non-conforming or rejected material can be dealt with in accordance with Procedure THC108 On Site Waste Acceptance and Rejection. Please inform NRW when

this has been completed.

A random selection of bins were checked to ensure these were compliant with storage requirements at the site. As identified previously some bins had been on site in excess of the requirements set out in the Healthcare Waste appropriate measures guidance.

[Healthcare waste: appropriate measures for permitted facilities - Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](#)

This stipulates that infectious, offensive and treated waste from alternative treatment plants should only be stored outside for 7 days, or 14 days if within a building. The following bin numbers were stored outside during the visit.

- WP00152 had arrived on site on 6 April 2023 and contained lab waste.
- CN42247 arrived on site on 10 April 2024 and contained yellow bag waste.
- WP00110 had arrived on site on 16 April 2023 and contained sharps.

In relation to the trailers stored on site, it was reported that staff only monitor the stock on site rather than when the trailers were actually emptied. It was noted that trailer WXM04 had come in on 18 April 2023. BH02 and WXM05 had both arrived on site on 21 April 2023. Guidance states that wastes should not be held in vehicles or on vehicle trailers unless they are being received or being prepared for imminent transfer. This was not the case and it was confirmed by email the following day that trailer WXM04 had been unloaded the evening of the inspection. Concerns have been raised previously regarding the storage of waste (see CAR 0039977). A response to this CAR was received on 10 August 2022 stating a review of THC WRX 001 – Procedure Waste Storage had been undertaken and the procedure was to be trained out to staff. This does not address adequately the storage of wastes on site or the storage of wastes within trailers.

This has been scored a category 3 breach against condition 1.1.1 - General Management.

Action 2: Review and update as necessary THC WRX001 ensuring that all relevant staff are aware of the requirements and their specific duties. Please provide NRW with a copy of the procedure and evidence that staff have been trained by 30 June 2023.

Hazardous Waste – consignment notes & consignee return

Consignment notes from the date of the site visit were requested to audit.

All sections on the consignment notes provided were completed correctly.

During the site visit a question was raised about multiple collections and when does a collection become a multiple collection. To clarify the regulations state:

This regulation applies to a journey made by a single carrier which meets the following conditions-

- the carrier collects **more than one** consignment of hazardous waste in the course of the journey;
- each consignment is collected from different premises (none of which is a ship);

- all consignments collected are transported by that carrier in the course of the journey to the same consignee

The Operators hazardous waste registration expired in November 2022 and was only renewed in April 2023. During this time 16 loads were taken from the Wrexham site to other Tradebe sites. The majority of this was APC residues that were taken to Tradebe Gwent.

You must ensure that your premises are registered as a hazardous waste producer which requires renewal every 12 months. The link to the webpage for renewal is below:

[Natural Resources Wales / Register or renew as a hazardous waste producer](#)

Outstanding action: There is an outstanding action from CAR NRW0040976 relating to floc EWC coding. Please provide an update on your findings to NRW by 30 June 2023.

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.