

Compliance Assessment Report CAR_NRW0042986

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: Site Inspection,

Reason: Routine.

On: 06/12/2023 between 09:50 and 12:45.

Parts of permit assessed: various.

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

Report sent to: Alan Rhodes, SHEQ Lead, on 18/12/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Management - General management	Action only (X)	
IR1A - Management - General management	C3 Minor	1.1.1
IR3C - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Emissions and monitoring - Noise and vibration	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total 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
IR1A	see Action 1 below	30/04/2024
IR1A	see Actions 2-4 below	31/01/2024

Compliance 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 (CAR) follows a routine site inspection of the Clinical Waste Transfer Station at Wrexham.

Officers met with the SHEQ Lead, SHEQ Officer, and Site Manager.

The weighbridge has been removed and the area where the weighbridge had been was being filled in, additional drainage was also being installed. Vehicles were temporarily entering the site via the car park entrance and exiting via the new gates onto Abbey Road South. These gates were open at the time of the visit as there had been an issue with the automatic opening mechanism following the recent storms. Officers have previously discussed installing gates onto the car park and trailer storage yard area.

Advice and Guidance: It is recommended that the installation of gates is included as part of the overall site works being undertaken during 2024 in order to secure the site.

Further concreting and drainage installation is due to take place during 2024 adjacent to the office portacabin.

Action 1: Following the changes to site the Operator should update their Traffic Management Plan and Drainage Plans. These should be completed by the 31st March 2024 and associated training provided to relevant staff by the 30th April 2024.

Following the removal of the HDU element of the permit, and as noted in CAR NRW0042315, a new conveyor system has been installed to transfer waste from bins into a trailer for onward transfer. Procedures linked to the operation of the conveyor have been developed. Officers noted that SWP 15.4 Use of Conveyor for Loading was in the control room and the relevant staff sign off sheet accompanied it.

The Operator stated that roller shutter doors into the old HDU area of the building were to be repaired / replaced during 2024.

The Operator is continuing with their bin rationalisation programme. It was noted that there were empty bins mixed with full bins, and although bins face different ways depending on whether they are full or empty, there was no clear segregation.

Issues were identified relating to bin storage. Some bins were overflowing, the lids were not closed or locked and therefore the waste was not secure. It also looked as though some palletised waste was not securely wrapped, although it was unclear whether this is how it had been delivered to site.

Advice and Guidance: Further investigation and monitoring of these loads should be undertaken by the Operator.

A random selection of bins were checked to ensure these were compliant with storage times. No issues were identified.

The quarantine area was blocked 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. This has been raised previously and the Operator needs to ensure they are operating in accordance with their procedures.

The above observations mean that the Operator is not complying with their procedure THC WRX 001 Waste Storage Procedures and not following EPR 5.07 Clinical Waste [How to comply \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk).

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

Action 2: Bins should be secured / locked as a matter of priority.

Action 3: The Quarantine area should be cleared as soon as possible and kept clear 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.

Action 4: Review procedure THC WRX 001 Waste Storage Procedures and update as necessary. Ensure that this is trained out to all relevant staff. Update NRW by 31st January 2024.

Waste acceptance and security will be reviewed on future compliance visits.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.