

Compliance Assessment Report CAR_NRW0044561

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: 18/06/2024 between 10:37 and 13:44.

Parts of permit assessed: See report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Daniel Grant.

Report sent to: SHEQ Officer, SHEQ Officer, on 16/08/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR4A - Installations - Information - Records	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1 General Management

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	Provide a copy of the site procedures that cover the acceptance and storage times of waste that require onward movement	06/09/2024
IR4A	Provide a copy of the consignment note for the onward	06/09/2024

Criteria	Action needed	Complete by
	movement of Bin CT30166/CN - HARPLA/000U0M	
IR1A	<p>3) Ensure SAP system is fully implemented with all the information referenced in the procedure, is accessible to all relevant staff and staff are fully trained in the use of the SAP system.</p> <p>4) Ensure all pre-acceptance audits are completed and in date for all wastes accepted to site.</p> <p>5) Review management systems to link the pre-acceptance audits with the new SAP system.</p>	29/11/2024

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 follows a pre-arranged site visit and waste producer acceptance audit.

Officers met with the SHEQ Lead, SHEQ Advisor, Site Manager and Key Account Manager.

The Group SHEQ Lead is still covering the TCM role and has provided certificates for a consultant to cover whilst they are on holiday. Staff provided a site tour and provided updates of the most recent works which included the installation of 2 new roller shutter doors (Doors 4&5) and completion of the repairs to the kerbing alongside the perimeter chain mail fence. Repairs to the expansion joints on the yard are scheduled to start on 24/06/24 prioritising the high traffic areas. These actions were referenced in CAR_NRW0043780. However, the gates to the trailer / car parking yard area have not yet been planned in and this remains a concern to NRW with regards security and managed access onto the site.

Waste Acceptance

Several barcodes were taken from a random selection of bins that were being stored in the yard outside which were then checked against the new SAP system that has been installed. Unfortunately, the data for all the bins could not be accessed at the time of inspection and a list has been emailed to the site to provide all the details for 6 bins that

were being stored in the yard area including electronic copies of the consignment notes. Examples of the data that was not available on the SAP system on the day of the audit is as follows:

- CT46369 - no acceptance date or EWC codes
- CN09149 - no acceptance date or EWC codes
- CN09149 - no data available as it pre-dated the new SAP and was a paper copy. A copy of the consignment note has been requested but not received.

THC Waste Acceptance and Rejection procedure details all of the information that should be available on SAP in Section 13 Waste Tracking. The SAP system is not working as per this procedure and it appeared staff needed more training on this system.

One of these bins (CT30166) contained mattresses which the site stated they could not process and was being stored until it could be transferred to another site for disposal. However, it was being stored in the area designated for faulty bins requiring repair. It was not clear where these items should be stored - the quarantine area or a specific storage area for wastes that require onward movement or what the timeframes are for the storage of these wastes. This bin of waste was accepted on 03/06/24. A copy of the consignment note for the onward movement of this waste will need to be provided.

Action

1) Provide a copy of the consignment note for the onward transfer of Bin CT30166, consignment note number HARPLA/000U0M.

2) Provide a copy of the procedures that cover the acceptance and storage times of wastes that require onward movement.

Several consignment note numbers were taken from Q1 2024 consignee returns data to check if Pre-Acceptance Audits had been completed on these producers. A spreadsheet is used to track the Pre-Acceptance Audits. Several of these were out of date and there was no system linking these audits to the SAP system where waste is received into. The site is currently looking into the possibility of linking these two systems.

CAT 3 score against 1.1 General management for inability of SAP system to provide all the information referenced in the procedure and for out of date pre-acceptance audits.

Actions

3) Ensure SAP system is fully implemented with all the information referenced in the procedure, is accessible to all relevant staff and staff are fully trained in the use of the SAP system.

4) Ensure all pre-acceptance audits are completed and in date for all wastes accepted to site.

5) Review management systems to link the pre-acceptance audits with the new SAP system.

In addition Action 2 from CAR NRW0043845 remains outstanding. Although a response

was received further queries were raised and the form linked to THC 108 procedure has not been provided. An update in relation to Action 4 from CAR NRW0043845 is also required. Please provide these by 06/09/2024.

Thank you for your time during the audit.

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.