

Compliance Assessment Report CAR_NRW0048099

Permit being assessed: WP3836ZF.

For: Wrexham Clinical Waste Treatment Facility (Incinerator), **held by:** Tradebe Healthcare National Limited

At: Wrexham Clinical Waste Treatment Facility (Incinerator) Marlborough Road , Wrexham Industrial Estate, WREXHAM, Clwyd, LL13 9RJ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 14/04/2025.

Parts of permit assessed: Q1 2025 returns.

NRW Lead Officer: Rebecca Harwood.

Report sent to: SHEQ Officer, SHEQ Officer, on 19/05/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR4C - Installations - Information - Notification	Assessed (A)	
IR4B - Installations - Information - Reporting	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.6.1(a)
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
6	24

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
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	02/06/2025
IR4B	see text below	02/06/2025
IR3E	see text below	02/06/2025
IR1A	see text below	02/06/2025

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 the submission of Quarter 1 2025 (January – March 2025) monitoring data.

Monitoring requirements are specified in condition 3.6 and reporting requirements in condition 4.2.

1. Q1 CEMS monitoring

CEMS monitoring data continues to be received monthly from the Operator.

Condition 3.2.1 requires that emissions to air will not exceed levels set out in Schedule 3, tables S3.1 and S3.1(a). Having reviewed the data submitted, the following ELV breaches

have been identified for Q1. Exceedances across the quarter have been consolidated per parameter.

Hydrogen Chloride - an exceedance of the ½ hour average ELV of 60mg/Nm³ was recorded during January 2025. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

VOC - exceedances of the ½ hour average ELV of 20mg/Nm³ were recorded during March 2025. **These have been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

CO - an exceedance of the daily average of 50mg/Nm³ was recorded in March 2025. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

There were no other CEMs exceedances above the ELVs.

Schedule 5 Notifications were received for the exceedances in accordance with condition 4.3.1 and are being reviewed.

2. Dioxin monitoring

An exceedance of the monthly dioxin ELV was recorded in January 2025 - 0.0885ng/Nm³ against an ELV of 0.08ng/Nm³. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

The February result was compliant.

Monthly dioxin monitoring was not undertaken in March as the plant was in its annual shutdown. The Operator is continuing to undertake monthly monitoring in accordance with the permit and has committed to undertaking monitoring soon after start up when the kiln has stabilised following previous exceedances.

Action 1: Monthly dioxin monitoring results should be forwarded to NRW when received. Any non compliances should be reported to NRW in accordance with the permit.

An initial response to Actions 4 and 5 from CAR NRW0045922 was received on the 18th March 2025. The response does not fulfil the requirements of the actions. Feedback was provided to the Operator and an extension until the 2nd June 2025 agreed for completion of the investigation and root cause analysis.

3. Bottom Ash & APC residues

Quarterly Bottom Ash and APC residues sampling was undertaken in accordance with condition 3.6.1(c) and table S3.5. The results were received on 29th April 2025. Ash composition remained below the 3% TOC limit for Q1.

Condition 3.1.3 requires that wastes produced at the site shall be sampled and analysed in accordance with schedule 3 table S3.5 whenever disposal or recovery routes change. As bottom ash is now being sent to hazardous landfill this monitoring should have been completed.

Action 2: Please provide the additional bottom ash analysis as required by condition 3.1.3 and table S3.5.

4. Emergency Relief Valve (ERV)

The ERV opened on 6 occasions during Q1 2025. The root cause relating to some of these openings have not been addressed as there continue to be issues with the boiler and ID fan.

Action 10 from CAR NRW0045922 relating to the ERV openings from 2024 remains outstanding. An extension to complete this action until the 2nd June 2025 has been agreed.

Further scores may be applied on review of this information.

5. AST 2024

The AST for 2024 was undertaken during September 2024 and the report dated the 11th November 2024. The report was only provided to NRW on the 31st March 2025 having been requested in CAR NRW0045922. On review of the AST it was noted that Hydrogen Chloride and Sulphur Dioxide failed the AST and the report states...*"The corrected values did not pass the calibration tests as required by EN 14181 and therefore the current calibration function is deemed to be invalid."*

Monitoring Guidance Note M20 states *"If a CEMS fails the validity or acceptance test during an AST, then an investigation should be conducted to determine the cause of the failure. Once you establish the cause of failure it might be necessary to do corrective maintenance. On completion, the CEMS must undergo a QAL2."*

Section 8.6 of EN14181 states *"If either of the two above tests fails, the cause shall be identified and rectified. Subsequently new parallel measurements according to QAL2 shall be performed, reported and implemented within 6 months."*

The Operator stated that an extended AST was to be undertaken at the beginning of April 2025, however, this was delayed due to issues with the kiln refractory following the shutdown in March.

As the follow up QAL2 following the AST failure was not *performed reported and implemented within 6 months* the CEMS monitoring equipment and results are not compliant with EN 14181 as required by condition 3.6.1(a), table S3.1. **This has been scored a category 3 breach of condition 3.6.1(a) against compliance criteria (IR3E)**

Monitoring.

Although an initial response to NRW's query regarding the failures was provided on the 1st April 2025 there is insufficient detail relating to any investigation being undertaken at the time. Following a discussion with the Operator they have confirmed that no investigation was undertaken and the results were not acted upon when received. The issue of AST and QAL2 results not being acted upon is a repeated failure suggesting that procedures and staff competency / training are inadequate.

The delay in reporting the AST to NRW and actioning the failures has been scored a category 3 breach of condition 1.1.1 against compliance criteria (IR1A) General Management.

Action 3: The Operator should review all procedures referencing AST / QAL2 to ensure they represent current operational and permit requirements. Key activities and responsible persons should be identified and training provided to relevant staff.

Action 4: The results of the AST / QAL2 completed in April should be forwarded to NRW when received.

Further compliance scores may be applied following a review of the subsequent AST / QAL2.

NRW will undertake an Operator Monitoring Assessment (Air) later in 2025.

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.