

Compliance Assessment Report CAR_NRW0048143

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: 22/04/2025 between 13:50 and 16:00.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood, accompanied by James McClymont.

Report sent to: SHEQ Lead, SHEQ Lead, on 02/05/2025.

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	C3 Minor	1.1.1
IR4A - Installations - Information - Records	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR1A - Installations - Management - General Management	C3 Minor	1.1.2
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
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
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
IR1A	Action 1	22/05/2025
IR4A	Action 2	13/05/2025
IR1A	already added to maintenance schedule	Already completed
IR3B	Action 3	31/12/2025
IR1A	see CAR NRW0048139 - Action 2	22/07/2025

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 a routine compliance inspection of Wrexham Transfer Station undertaken on the 22nd April 2025. The Site Manager, SHEQ Lead and SHEQ Officer were on site for the visit.

The yard was tidy and well ordered. A random selection of bins were checked to ensure these were compliant with storage requirements at the site. One bin containing orange bags to be transferred to Swindon had arrived on site on 11/04/2025. This was stored outside. This bin 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 clinical and offensive waste should only be stored outside for 7 days, or 14 days if within a building and is referred to within the Operators procedures. **This has been scored a category 3 breach against condition 1.1.1 - compliance criteria IR1A General Management.**

Action 1: Ensure bins are stored onsite in accordance with permit conditions, relevant guidance and Operator procedures. Further checks will be undertaken at future inspections.

Action 2: Provide paperwork for Bin CT30257 to demonstrate when it was transferred off site. This should be sent to NRW by 13/05/2025.

The Operator was unable to confirm when the interceptor had last been inspected or cleaned as requested during the last inspection and documented within CAR NRW0046022, as such the Interceptor was cleaned on the 31/03/2025. Officers had previously been told that the interceptor was on the Computerised Maintenance Management System (CMMS) for quarterly inspections and 6 monthly pump out as required (CAR NRW0041601). It appears that this had not happened as records could not be found. **This has been scored a category 3 breach against condition 1.1.2 - compliance criteria IR1A General Management.** The Operator stated that the interceptor had now been added to the maintenance schedule for an annual inspection / clean. Officers may review paperwork on future inspections.

The Operator confirmed that the expansion joint repairs in the yard area are scheduled for May and stated that it is likely that further visits will be required. The gates to the trailer parking area are to be installed by the end of April 2025. Damaged kerbing to the north west of the site is to be repaired by the end of 2025. The damage kerbing has been identified previously and it was anticipated that this was due to be repaired during 2024 but has been delayed.

Action 3: Ensure kerbing is repaired and maintained to avoid any offsite contamination in event of an incident requiring the penstock to be closed and water being contained on site escaping on to the adjacent unmade ground.

The Operator was reminded of the Operator Competence requirements for the site, condition 1.1.4. The CIWM (WAMITAB) Operator Competence Scheme (also known as CoTC) is designed to allow permitted waste facilities in England and Wales to demonstrate they employ technically competent people with the knowledge and skills to ensure waste sites comply with the Environmental Permitting (England and Wales) Regulations. A previous CoTC holder used by the site as cover has left the organisation. Resilience within the organisation is required to avoid lack of cover. It was confirmed that both the Site Manager and Plant Manager are undergoing WAMITAB CoTC training and that this is nearing completion.

A discussion was held relating to the completion of CAR actions. NRW officers spend time chasing the Operator for updates relating to previous CAR actions once deadlines have passed. Officers discussed with the Operator the use of their Q Pulse system. Although this system continues to be used, its functionality in relation to CAR actions appears to be insufficient. Officers asked to see previous actions on the system and this proved difficult to evidence, actions could not be easily assigned to others and it was unclear who was responsible for monitoring and closing out the actions. It is unclear whether all actions were on the system. **This has been scored a category 3 breach against condition 1.1.1 - compliance criteria IR1A General Management.**

The action relating to the completion of actions and the suitability of the Q Pulse system is detailed in CAR NRW0048139.

Officers will continue to track actions. Further delays to the completion of actions without prior agreement may result in an escalation of compliance scores and enforcement action.

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.