

## Compliance Assessment Report CAR\_NRW0048139

**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:** 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 Officer, SHEQ Officer, 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
IR2E - Installations - Operations - Improvement programme	C3 Minor	2.4.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR2E	Action 1	02/06/2025

Criteria	Action needed	Complete by
IR1A	Action 2	22/07/2025
IR3D	Action 3	22/05/2025

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 Incinerator undertaken on the 22<sup>nd</sup> April 2025. The Site Manager, SHEQ Lead and SHEQ Officer were on site for the visit.

Discussions were held prior to the site inspection relating to ongoing operational issues, shutdown works, recent staff changes, monitoring and outstanding actions.

The Mercury CEMS had failed over the weekend prior to the inspection. The Operator shutdown the plant and it was agreed with NRW that the plant could operate without the CEMS as Element were on site to undertake the routine periodic monitoring, including mercury. NRW will discuss next steps once the results have been received and reviewed.

The second particulate probe that was installed as a back up is not in use. All previous actions relating to this are now obsolete.

The Operator has confirmed that the missing PAH monitoring from 2024 will be undertaken at the end of April 2025. There will therefore be 3 sets of PAH monitoring during 2025.

Improvement Conditions IC16 and IC17 remain outstanding. Despite previous requests for timescales of when these would be completed, this has not been forthcoming. It was agreed that IC17 (Residues Management Plan) would be submitted before the end of April. This was subsequently received on the 23<sup>rd</sup> April 2025. NRW will review this. **The ongoing delays in relation to IC16 (Baseline survey) have been scored a category 3 breach against condition 2.4.1 - compliance criteria IR2E Improvement Programme.** An update relating to IC16 is required.

**Action 1:** Provide details of the information outstanding and required in order to complete IC16. A timeline detailing the stages to be completed and when IC16 will be resubmitted

should also be included. This information should be provided to NRW by 02/06/2025.

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.**

**Action 2:** The Operator should review the use of Q Pulse as a repository for tracking actions. If it is deemed not suitable then the Operator should consider alternatives to ensure that actions raised in CARS are responded to within the timescales set out and the information requested is provided to NRW. An update should be provided to NRW setting out how the Operator proposes to monitor CAR actions going forward by 22/07/2025.

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.

### ***Site Inspection***

The Operator provided an update to the works that had been completed during the recent shutdown and some of these were viewed during the inspection.

A slight steam leak was observed coming from the kiln rotary seal at the discharge end. The Operator stated that this emission should reduce as the kiln warms up and the joints expand following the recent shutdown. The Operator should monitor the emission and undertake further remedial work if the leak remains.

The carbon bags are on load cells, this will enable more accurate reporting of carbon dosing to be recorded. Carbon dosing is manual and will be optimised once the kiln and CEMs readings stabilise. The lime dosing is reactive and responds to the HCl and SO<sub>2</sub> CEMs data.

Noise from the building fan nearest the main entrance was particularly audible on Marlborough Road. The Operator stated that this fan does not operate all the time and Officers have not noticed this previously.

**Action 3:** Provide paperwork for maintenance and inspection of the building fan and include details of when the fan operates should be provided to NRW by 22/05/2025.

Element were onsite during the inspection undertaking the periodic monitoring and completing the AST / QAL2 requirements. Officers spoke with the Technician onsite performing the monitoring. He explained what monitoring he was completing, how the different equipment works and how he notifies the Operator of any issues identified during the monitoring campaign. Nb: The AST failure from 2024 has been addressed in CAR NRW0048099.

IBA continues to be sent to hazardous landfill for disposal. The Operator has stated that at present there is no plan to test the IBA to demonstrate it is non-hazardous.

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](mailto: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](mailto: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.