

Compliance Assessment Report CAR_NRW0048807

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: 14/07/2025.

Parts of permit assessed: Q2 2025 returns.

NRW Lead Officer: Rebecca Harwood.

Report sent to: SHEQ Officer, SHEQ Officer, on 25/09/2025.

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
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.1.3 & 3.6.1(c)
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.3.1
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.6.1(a)
IR1A - Installations - Management - General	C3 Minor	1.1.1

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
Management		
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
9	36

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 action 1 & Reg 36 notice issued	01/09/2025
IR3A(2)	see action 2	31/08/2025
IR3E	see action 3	30/09/2025
IR3B	Reg 36 notice issued	18/08/2025
IR3E	see action 4	30/09/2025
IR1A	see action 5	30/09/2025

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report (CAR) follows the submission of Quarter 2 2025 (April – June 2025) monitoring data.

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

1. Q2 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 Q2. Exceedances across the quarter have been consolidated per parameter.

Hydrogen Chloride - there were exceedances of the ½ hour average ELV of 60mg/Nm³ recorded during April and June 2025. **These have been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

Hydrogen Chloride - there was an exceedance of the daily average ELV of 8mg/Nm³ recorded in April 2025. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

Sulphur Dioxide - there was an exceedance of the ½ hour average ELV of 200mg/Nm³ recorded during April 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. The Operator believes the exceedances are related to the wastes being burnt at the time.

2. Dioxin monitoring

Exceedances of the monthly dioxin ELV were recorded in April and June 2025 - 0.3017ng/Nm³ and 0.1273ng/Nm³ respectively, against an ELV of 0.08ng/Nm³. **These have been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

The Operator is undertaking twice monthly monitoring as per the Dioxin protocol.

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

The investigations into the dioxin exceedances are ongoing. An initial response to Actions 4 and 5 from CAR NRW0045922 was received on the 18th March 2025. Following feedback a root cause investigation report was received on 2nd June 2025.

Further discussions were held with the Operator and a schedule of works to address the ongoing issues in relation to the dioxin exceedances was submitted to NRW. A Regulation 36 Notice formalising these actions was issued to the Operator on the 4th July 2025.

2. Biannual Air Emissions Monitoring

Biannual air emissions monitoring was undertaken from emission point A1 during April 2025.

There was an exceedance of the heavy metals ELV - $0.8396\text{mg}/\text{Nm}^3$ against an ELV of $0.3\text{mg}/\text{Nm}^3$. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air.**

The schedule notification states that the testing was undertaken shortly after the incinerator had started up and therefore the results were not a true reflection of normal operating conditions. The Operator has stated that a retest will be undertaken in July. This was delayed from June due to further periods of shutdown.

Action 2: Undertake further monitoring of heavy metals and report the result to NRW upon receipt.

There was also an exceedance of the dioxin ELV - $0.6134\text{ng}/\text{Nm}^3$ against an ELV of $0.06\text{ng}/\text{Nm}^3$. **This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IR3A(2)) Emissions to air, consolidated.** See comments above.

Additional PAH testing was completed in April in response to Action 6 of CAR NRW0045922.

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 8th July 2025. Ash composition remained below the 3% TOC limit for Q2.

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. As requested in CAR NRW0048099, the Operator sent their results to NRW on 27th May 2025 however the analysis is incomplete. There was no explanation accompanying the results explaining why the analysis was incomplete. **This has been scored a category 3 breach of condition 3.1.3 & 3.6.1(c) against compliance criteria (IR3E) Monitoring.**

Action 3: Please complete the additional bottom ash analysis as required by condition 3.1.3, 3.6.1(c) and table S3.5 and report the results to NRW upon receipt.

4. Emergency Relief Valve (ERV)

The ERV opened on 9 occasions during Q2 2025. The root cause reported to NRW

continue to be issues with the boiler and ID fan, works to date have not resolved the issue resulting in unabated emissions to air via the ERV. **This has been scored a category 3 breach of condition 3.3.1 against compliance criteria (IR3B) Emissions of substances not controlled by emission limits.**

Following discussions with the Operator a schedule of works to address the ongoing issues relating to the activation of the ERV was submitted to NRW. A Regulation 36 Notice was issued to the Operator on the 4th July 2025.

5. AST / QAL2 2025

An AST was undertaken in April 2025, the hydrogen chloride and sulphur dioxide again failed. The test house obtained enough data to complete a QAL2. The Operator has stated that the new calibration factors were applied to the DAHS.

When reviewing the calibration functions on the DAHS during the site visit on the 15th July 2025 it appears that the hydrogen fluoride and ammonia CEMS have not had a QAL2 undertaken since installation. These parameters were added to table S3.1 because of recent permit variations. The CEMS monitoring equipment and results are therefore 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.**

Action 4: Undertake QAL2s on the outstanding parameters in accordance with BS EN14181 immediately. The Operator should keep NRW informed of progress.

The Operator has failed to identify that the new monitoring parameters required calibration in line with BS EN14181. **This has been scored a category 3 breach of condition 1.1.1 against compliance criteria (IR1A) General Management.**

Action 5: Ensure that relevant staff undertake a review of permit variations as they are issued to identify and implement any changes required. Procedures should be updated and relevant staff trained.

NRW will undertake a further review of the CEMS as part of the 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.