

Compliance Assessment Report CAR_NRW0049678

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: 15/10/2025 between 10:30 and 12:15.

Parts of permit assessed: Reg 36 Notice Compliance.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Site Manager, Site Manager, on 20/10/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
IR2C	see text below	28/01/2026

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.

At this time, we do not intend to take any further action.

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 an unannounced inspection of the Wrexham Clinical Waste Incinerator to assess compliance with the Regulation 36 statutory notice that was issued to the Operator on the 4th July 2025.

The Operator has responded to all steps identified within the notice following a completion date extension relating to the baghouse investigations.

This inspection was to corroborate the information provided.

Dioxin emissions

Recent results have indicted compliance with the dioxin ELVs.

A real time carbon dosing monitoring system has been installed at the site. The SCADA control panel was observed during the visit. An anomaly was identified between the carbon dosing rate seen on the SCADA system and that indicated in the notice response. The speed of dosing (carbon screw speed) was consistent between the SCADA system and notice response.

Following further discussion, it became clear that the anomaly was due to a calculation error on the SCADA system because of the way it operates. The SCADA system includes hours of operation from when the carbon bag has been changed. The plant had been in shut down when the carbon bag was changed, therefore additional hours were included in the calculation when dosing did not occur until start up several hours later. The SCADA system also does not allow for the weight of any residual carbon in the system following a bag change, the logged weight may therefore be incorrect and impact the calculation of the dosing rate. Historic trends relating to the dosing of carbon were seen and a steady draw down of carbon could be seen.

Advice & Guidance: The Operator should review the link between the SCADA system and actual operations to ensure that there is no confusion in relation to the dosing rates.

Pre and post baghouse efficiency testing was undertaken during July 2025. The Operator stated in their response that the results demonstrated that *"the carbon absorption system and bag house arrangement is performing effectively"*.

The Operator has held meetings with a bag filter supplier and a bag filter from the site has been sent away for inspection. Further information will be provided to NRW once the results of the bag filter inspection have been completed.

The Operator has also committed to further work in relation to the baghouse and carbon dosing process within their response to the notice. The timing of further improvement work is subject to future planned shutdowns as well as receiving and reviewing the responses from the bag filter supplier.

Action: The Operator should provide an update, including any further work to be completed and associated timescales to NRW by 28/01/2026.

Emergency Relief Vent (ERV) operation

The boiler level controls were seen on the SCADA system and appeared to be working well.

The Operator stated that the boiler outlet duct was inspected and the cladding replaced as part of the recent shutdown. Contractors were onsite at the time of the inspection finishing off this work.

The Operator also stated that ID fan inverter is limited to 80% and this is fixed. This was seen on the SCADA system. This should avoid further issues with the ID fan tripping and the ERV subsequently being activated.

Recent ERV activations have been as a result of the emergency stop button being accidentally pushed, these have now been shrouded to avoid further accidental stops.

Maintenance

The Operator has introduced a new computerised maintenance management system "MaintMaster" to track planned maintenance activities. This system was reviewed during the inspection and discussions had about its use. The introduction of the system is a positive step forward and it is clear that it could become beneficial and powerful in the management of maintenance activities at the site. This system may be interrogated further during future compliance inspections.

NRW considers that the steps within the Regulation 36 notice have been completed. As detailed above, the Operator has stated that further work is ongoing in relation to their investigation into the baghouse operations. NRW will review this information when received.

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.