

Compliance Assessment Report CAR_NRW0050758

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: 31/12/2025.

Parts of permit assessed: Q4 2025 and 2025 Annual Returns.

NRW Lead Officer: Ricky Hartleb.

Report sent to: SHEQ Officer, SHEQ Officer, on 19/02/2026.

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
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IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.2.1
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
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
4	16

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 Action 1	Already completed
IR3A(2)	See Action 1	Already completed
IR3A(2)	See Action 1	Already completed
IR3A(2)	See Action 1	Already completed

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 4 2025 monitoring data and the 2025 annual monitoring returns.

1. Q4 CEMS monitoring

Continuous Emissions Monitoring System (CEMS) monitoring data continues to be submitted monthly by the Operator.

Condition 3.2.1 requires that emissions to air must not exceed levels set out in Schedule 3(b), Tables S3.1 and S3.1(a).

A review of the Q4 data has identified the following emission limit value (ELV) breaches, consolidated per parameter:

- Sulphur Dioxide (SO₂) – Exceedances of the ½ hour average ELV of 200mg/Nm³ were recorded during November. This has been scored as a category 3 breach of condition 3.2.1

against compliance criteria (IRA3A(2)) Emissions to air.

- Carbon Monoxide (CO) – Exceedances of the 95th percentile ELV of 150mg/Nm³ were recorded during November and December. An investigation undertaken by an external contractor identified a damage cable connected to the CO probe, which may have contributed to high readings. However, in the absence of definitive evidence proving the exceedances were caused by the faulty probe, this has been scored as a category 3 breach of Condition 3.2.1 against compliance criteria (IRA3A(2)) Emissions to air.
- Carbon Monoxide (CO) – Exceedances of the daily average ELV of 50mg/Nm³ were recorded during November and December. This has been scored as a category 3 breach of condition 3.2.1 against compliance criteria (IRA3A(2)) Emissions to air.
- Total Organic Carbon (TOC/VOC) – Exceedances of the ½ hour average ELV of 20mg/Nm³ were recorded during December. This has been scored a category 3 breach of condition 3.2.1 against compliance criteria (IRA3A(2)) Emissions to air.

2. Monthly dioxin monitoring

Natural Resources Wales (NRW) has received the monthly Dioxin reports for October and November 2025.

No monitoring was undertaken in December 2025 as the plant was offline.

No exceedances were identified in the reports received.

3. Bi-annual Air Emissions Monitoring

Bi-annual air emissions monitoring was undertaken from emission point A1 during October 2025.

1 exceedance was recorded: A Dioxin value of 0.0653 ng/Nm³ against an ELV of 0.06 ng/Nm³. Due to an uncertainty value of 0.0151, this exceedance is recorded for information only and will not be scored.

No other ELV exceedances were reported.

4. Notifications

The Operator submitted all Schedule 5 notifications for exceedances in accordance with Condition 4.3.1.

Thank you for your continued efforts to improving compliance in this category.

5. Bottom Ash & APC residues

Bottom Ash and Air Pollution Control (APC) residues sampling was undertaken in accordance with Conditions 3.6.1(c) and Table S3.5.

TOC levels remained below the 3% limit for Q4.

Incinerator Bottom Ash (IBA) continues to be sent to hazardous landfill.

6. Annual Performance

The annual performance spreadsheet and other required annual reporting information were submitted to NRW in accordance with Condition 4.2.2.

NRW has identified some inconsistencies in the reported data, which we would like to discuss with you further. No score will be assigned for this matter.

7. Emergency Relief Valve (ERV)

The ERV opened on 1 occasion during Q4 2025 due to a plant trip and loss of power.

During 2025, the ERV opened on 22 occasions. A Regulation 36 Notice was issued on 4 July 2025, with compliance actions recorded within Compliance Assessment Report CAR_NRW0049678.

NRW will continue to monitor and review any incidents of the ERV opening.

8. Waste Returns

Condition 4.2.5 requires quarterly waste returns to be submitted within one month of the end of the reporting period.

Quarterly waste returns have been submitted by the Operator and a review of waste returns will be undertaken separately.

9. Actions

Action 1: The Operator should continue to investigate and undertake root cause analysis into future emissions exceedances. Please continue to report these exceedances via Schedule 5 Notifications.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.