

Compliance Assessment Report CAR_NRW0052135

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: 31/03/2026.

Parts of permit assessed: Q1 2026 Returns.

NRW Lead Officer: Ricky Hartleb.

Report sent to: SHEQ Officer, SHEQ Officer, on 15/07/2026.

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
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.6.1 & Schedule 4, Table S4.1

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
IR3A(2)	see text below	30/06/2026
IR3E	See Action 1	31/07/2026

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.

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) has been completed following submission of Quarter 1 2026 monitoring data (01 January to 31 March 2026).

Monitoring requirements are specified in condition 3.6 and reporting requirements in condition 4.2.1 of the permit.

1. CEMS monitoring

CEMS monitoring data continues to be submitted monthly by the operator.

Condition 3.2.1 requires that emissions to air do not exceed the emission limit values (ELVs) set out in Schedule 3, Tables S3.1 and S3.1(a).

Following review of the data submitted for Q1 2026, the following ELV breach has been identified (exceedances consolidated by parameter):

- CO: One exceedance of the daily average ELV of 50 mg/Nm³ recorded in January 2026.

This has been assessed as a Category 3 breach of condition 3.2.1, against compliance classification IR3A(2) Emissions to air.

No other CEMS exceedances above ELVs were identified during the quarter.

A Schedule 5 notification was received in accordance with condition 4.3.1 and is currently under review.

2. Dioxin monitoring

No exceedances were recorded in the monthly dioxin monitoring between January and March 2026.

Based on the monitoring results submitted, the requirement for additional testing has been satisfied and monitoring has reverted to the six-monthly frequency (H1 and H2) specified within the permit.

3. Bottom Ash (IBA) & APC residues

Quarterly Bottom Ash (IBA) and APC residue monitoring results were received from the operator on 07 July 2026, following an agreed extension. The submission included APC residue metals, dioxin and dioxin-like PCB results, however, no valid IBA TOC or LOI result was provided.

Condition 3.6.1(c) requires the operator to undertake monitoring of residue quality in accordance with Schedule 3 Table S3.5, and to report the results in accordance with Schedule 4 Table S4.1.

As valid IBA TOC/LOI monitoring data has not been submitted, compliance with the IBA TOC limit specified in Schedule 3 Table S3.5 cannot currently be verified.

The breach of Condition 3.6.1(c) remains applicable pending submission of valid monitoring results. This has been assessed as a Category 3 breach of Condition 3.6.1(c) (Monitoring).

Action 1

Provide valid Q1 2026 IBA TOC monitoring results in accordance with Schedule 3 Table S3.5.

IBA TOC Analysis

The operator has advised NRW of a potential issue relating to the analytical methodology used to determine Total Organic Carbon (TOC) in the Q1 2026 IBA samples. It has been reported that the current laboratory included elemental carbon within the reported TOC value, which differs from the methodology previously used.

Schedule 6 of the permit defines TOC as:

“TOC means Total Organic Carbon... in respect of Bottom Ash, this means the total carbon content of all organic species present in the ash (excluding carbon in elemental form).”

The permit also requires TOC analysis to be undertaken in accordance with BS EN 14899 and either BS EN 13137 or BS EN 15936 (Schedule 3 Table S3.5).

NRW notes the explanation provided by the operator regarding the laboratory methodology, however, at the time of this CAR form:

- Valid TOC monitoring results demonstrating compliance with permit requirements have not been provided
- Compliance with the TOC limit specified in Schedule 3 Table S3.5 cannot currently be verified

Compliance Position

Residue monitoring data has been submitted, however, valid IBA TOC/LOI results have not yet

been provided in accordance with permit requirements.

The operator submitted additional information on 10 July 2026 in response to NRW's request for further information. This information had not been fully reviewed at the time of issuing this CAR and will be considered as part of NRW's ongoing assessment of the matter.

NRW's compliance position will be reviewed following assessment of the additional information submitted by the operator and receipt of any revised monitoring results.

4. Emergency Relief Valve (ERV)

The ERV opened on one occasion during Q1 2026 because of a plant trip.

5. Waste Returns

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

Quarterly waste returns have been received from the operator.

NRW will undertake an Operator Monitoring Assessment (Air) in August 2026 to verify compliance with monitoring requirements.

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.