

Compliance Assessment Report CAR_NRW0039535

Permit being assessed: WP3636ZG.

For: Wrexham Clinical Waste Treatment Facility (HDU & TS), held by Tradebe Healthcare National Limited

At: Tradebe Healthcare HDU & TS, Marlborough Road, Wrexham Industrial Estate, Wrexham, Wrexham, LL13 9RJ.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 17/02/2022 between 12:30 and 14:15.

Parts of permit assessed: Various

NRW Lead Officer: Rebecca Harwood, accompanied by Jamie Blythin.

Report sent to: Helder Daravano, Operations Director on 15/03/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B4 - Infrastructure - Containment of stored materials	Action only (X)	
C3 - General Management - Materials acceptance	C3 Minor	2.1.1
C3 - General Management - Materials acceptance	C3 Minor	2.3.3

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

Total number of 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
B3	see Actions from CAR NRW_0039308	31/03/2022
B4	see Action 1 below	31/03/2022
C3	see Action 2 below	31/03/2022
C3	see Action 2 below	31/03/2022

Action 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 follows a routine site visit on 17 February 2022.

NRW officers were accompanied around site by the new Site Manager and SHEQ Manager.

Due to a change in staffing over the last 18 months it has become apparent that information and knowledge relating to the operation of the site has been lost.

Following the previous visit in January and the fire at the HDU in November the Operator confirmed that a number of processes are being reviewed. This included a review of the start up / shut down procedures, ensuring waste is not loaded until the temperature has been set. Please see CAR_ NRW0039272 for actions relating to procedures.

The Operator confirmed that a drainage survey was being organised so that they could better understand the layout of the drains. It was confirmed that there was a manual switch that enabled the waste water in the bin wash to be disposed of to foul sewer. This should be confirmed as part of the review of drainage at the site.

The penstock valve that had previously been covered with bins was accessible and a barriered walkway has been installed. The penstock manhole was opened by site staff and there did not appear to be any water within the manhole. It was confirmed that the penstock was kept closed and only opened when discharging. Please see CAR_ NRW0039308 for actions relating to the penstock and site drainage.

An IBC at the back of the site near to the emission points was unbunded. This area had been tidied since the previous visit following the leak from the pipe connecting the IBC, however the Operator was unable to clarify what the IBC was being used for.

Action 1: Confirm what liquid is stored within the IBC, what it is used for and why it does not have any secondary containment.

The bins on site were seemingly more organised, however it was still unclear where the dividing line was for bins going into the HDU for processing and those going to the incinerator. Please see CAR_ NRW0039308 for actions relating to waste storage and handling.

It was noted that a number of bins to the rear of the site looked like they had not moved since the previous visit. Officers reminded the Operator about the storage requirements on site and some spot checks were done relating to the bins in the corner. The Operator

stated that these bins contained gypsum waste and were added incrementally to the Incinerator to reduce the chance of air emissions and SO₂ spikes caused by the gypsum.

It is unclear whether these bins were just being used for storage and therefore when the waste had been placed in them. Based on the description of at least one bin (15637), the system stated that it was booked in on the 19.12.2021 and contained gypsum. It is therefore likely that these bins have been on site longer than guidance states [Waste storage, segregation and handling appropriate measures - Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#). **This has been scored a CCS3 breach of Condition 2.1.1.**

Subsequently the consignment note for the bin was requested. This shows that the waste has come in as EWC 18 01 04. This code is not listed within the Permit for storage, Table S2.3. **This has been scored a CCS3 breach of Condition 2.3.3.**

Action 2: In addition to the actions identified in CAR_NRW0039308 please also

- Investigate why waste is being stored onsite for longer than 14 days.
- Review your waste acceptance procedures to ensure waste is only stored in accordance with Condition 2.3.3.
- Confirm your rejected load procedure.
- Ensure staff are provided with adequate training to comply with these procedures.

Report back to NRW by 31.03.2022.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.