

Compliance Assessment Report CAR_NRW0042699

Permit being assessed: DB3231RX.

For: Natural U K Ltd Healthcare Management Facility, held by Natural U K Ltd
At: Unit 3, Capel Hendre Industrial Estate, Capel Hendre, Ammanford, Carmarthenshire, SA18 3SJ.

Type of assessment carried out: Audit, Reason: Routine.

On 26/10/2023 between 10:00 and 13:15.

Parts of permit assessed: EMS and site walkthrough

NRW Lead Officer: Linda Warrick.

Report sent to: Rhiannon Chapple, SHE & Compliance Manager on 05/12/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Action only (X)	

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

Total number of 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
C1	Dates have been forwarded when HROC6 (Physical and Chemical Treatment) will be added to the TCMs ongoing continuing competency training.	Already completed

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.

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

An Environmental Audit was conducted to ensure the recent treatment operations were being appropriately operated and managed. NUK are working towards a SHE Management system the current system is internal .

Linda Warrick met with Rob Poyer, Craig Masters and Rhiannon Chapple to discuss the EMS. It was an overcast day with some scattered showers.

Items discussed were:

Pre acceptance

NUK conduct their own audits on producers to ensure the waste types are being correctly coded, managed and stored. LW was shown two recent pre acceptance audits. These were of an excellent standard and covered all the appropriate areas.

Waste tracking

Waste is logged by the pick up drivers along with the consignment notes. Once at site the waste is identified further by tags displaying the date and the last 4 digits of the registration of the vehicle that picked the waste up. This ensures each load can be tracked back to the producer.

Technical competence

There are several employees working towards their WAMITAB TCM certificate. The certificates currently registered are for Rob Poyer for the transfer of non hazardous waste. Scott Poyer has a transfer of hazardous waste. I highlighted that the new technology requires the treatment and transfer of hazardous waste. RC stated that these are being currently being worked towards and will be completed by the 12th of December. Level HROC6 Operator Competence for Managing Physical and Chemical Treatment of Healthcare Waste. Please provide copies of the certificates once they have been issued.

Air Emissions monitoring

During the commissioning of the plant Matt Wadie measured small amounts of bioaerosol around the hopper. These were well below the threshold. The plant was limited to running a maximum of 36 hours at any one time. After further discussions with Matt is has been agreed that the plant can start to monitor continuously with the prevision of more monitoring during the initial period. Please provide NRW with the details of this monitoring along with dates and specific parameters prior to the onset of the continuous operating of the plant.

Routine Efficacy monitoring

Routine efficacy testing has produced great results with all laboratory analysis exceeding expectations. RC is to send LW report on the 8 performance data results. Please provide these by the 12th of January 2024.

Contingency Plans

Please provide full details of contingency plans for plant breakdown, storage of clinical

waste onward disposal outlets etc by the 12th of January

Consignee returns

On reviewing the site Consignee returns there was an issue identified earlier in the year where a consignment movement from Valero was not picked up on a Consignee Return. Please ensure this is addressed and procedures are in place to prevent further incidents of this type.

At the time of the site visit the treatment process was not operational. The site and documentation is well organised, with excellent housekeeping. Storage of permitted wastes within the building are well signposted with a good tracking system in place. That together with excellent pre acceptance checks provides confidence waste classification and the appropriate treatment. Many thanks for your time during the inspection.

In this document Natural Resources Wales means the Natural Resources Body for Wales established by Article 3 for the Natural Resources Body for Wales (Establishment) order 2012

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.