

**This form will report compliance with your permit as determined by an NRW officer**

Site	Neath And Port Talbot Hospital	Permit Ref	EP3198FW		
Operator/Permit holder	Veolia Energy & Utilities Services UK Plc				
Regime	Waste Operations				
Date of assessment	28/11/2017	Time in	10:00	Out	12:30
Assessment type	Audit				
Parts of the permit assessed	Fracture Clinic, Outpatients and Waste transfer station				
Lead officer's name	Warrick, Linda				
Accompanied by					
Recipient's name/position	Amanda Hayes/ Site administrator	Date issued	07/12/2017		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
C4 - General Management - Storage, handling labelling and Segregation	C3	2.5.6
	C3	S1.1

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.  
**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,  
**O** = Ongoing non-compliance, not scored.

<b>Number of breaches recorded</b>	<b>2</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>8</b>
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**If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response**

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This inspection incorporated a number of departments within the hospital to identify segregation of non-hazardous and hazardous clinical waste. The areas visited were:

Fracture Clinic

Outpatients

Ward C

Pharmacy

### **Environmental Management Systems**

A number of audits are undertaken at the hospital with regards to waste:

#### **1. LRQA**

The site are accredited to an external EMS. Lloyds Register who are a UKAS accredited EMS supplier. The last audit was undertaken in October 2017. There were no areas for attention identified in this audit.

- **Duty of Care**

Bob Seeley from Veolia has undertaken a Duty of Care Audit at Natural UK who process the hospitals tiger bag waste. There were no issues identified. Please ensure that a similar audit is carried out at the Tradebe facility where the infectious waste is treated/destroyed.

- **Pre acceptance audit**

A pre acceptance audit was undertaken by the Health Board and SRCL who are the main contractor for clinical waste for the All Wales Consortium. A number of areas were identified mainly in relation to domestic waste being placed in clinical and offensive waste stream.

- **Daily feedback**

The waste technicians who remove the waste from the various collection points around the hospital feedback any concerns or non-compliances to Amanda Hayes. Due to the set up with the 2 separate management structures between Veolia and Bro Morgannwg Health Board certain issues can take an unacceptable amount of time to correct.

If there are any situations where non compliances such as mixing of hazardous and non-hazardous waste are identified by Veolia staff, it is important that these areas are identified and actions detailed in the sites management and contingency plans. Waste acceptance measures are the permitted sites responsibility and these procedures and contingency plans document how you deal with these situations. These procedures should be documented and communicated to your clients. Please refer to EPR 5.07 How to comply with your environmental permit (additional guidance for Clinical waste).

- **Clinical Waste Bags**

A Tiger bag was located in one of the public rest rooms in Ward C. There was an orange (infectious) waste bag located in the staff rest room in Ward C. Please ensure these bags are only available in nursing areas.

- **Gypsum waste (plaster casts)**

There is currently some confusion with Gypsum waste. Since 2009 this waste has been banned from co-disposal landfilling. It must be placed in stable non- reactive cells in landfills, incinerated or recycled.

The majority of Gypsum waste generated in a hospital will be non- infectious and should not be placed in the Infectious waste bags. However if tiger bags are used for this waste it is important that they are clearly marked identifying the presence of Gypsum as this will determine which landfills they can be taken to.

From the information you have supplied it appears that the Health board are introducing Gypsum waste only containers for onward incineration and not landfill. Until a definitive decision has been made regarding Gypsum waste this will be acceptable.

- **Sharps**

Medicinally contaminated sharps are dual coded which is correct 18 01 03/18 01 08, or 18 01 03/18 01 09. Please ensure all sharps boxes are dated and fall within the 3 month period for disposal.

- **Consignment Notes**

A cross section of consignment notes were forwarded and all were in order apart from the time of collection was missed off one of the notes.

- **Training**

There are posters displayed in the dirty utilities and some nursing stations. Waste segregation is covered during induction training. Some departments and wards have had issues with mixing of hazardous and non-hazardous waste. When this is identified Veolia staff should provide refresher/awareness training to ensure their waste acceptance criteria is met.

- **Pharmaceutical Waste**

Medicines and tablets from ward areas are all placed in boxes and returned to the pharmacy for removal and destruction. The pharmacist segregates them into the appropriate bucket.

- **Transfer Station**

The transfer station was undergoing some maintenance to the impermeable pavement. Please ensure NRW is notified of any future improvements to the permitted area. The black bag waste (EWC 20 03 01) storage skip was located outside the permitted area. The waste is compacted prior to removal and there was evidence of liquids seeping from the containers. Please ensure this container is placed back within the permitted area and sealed drainage system by the end of the working week.

The metal skip is currently located outside the permitted area. This is in breach of your permit. Scrap metal cannot be stored under an exemption but you are permitted to store it on an impermeable pavement and sealed drainage. You will need to relocate this skip into the permitted area by the end of the working week.

There are recycling containers located outside the permitted areas. These need to be registered with NRW.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0032569**

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### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C4	C3	Orange (infectious) waste bags in public toilets	05/01/2018
C4	C3	Place permitted wastes within permitted area	15/12/2017

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.