

Compliance Assessment Report CAR_NRW0046245

Permit being assessed: EP3198FW.

For: Neath And Port Talbot Hospital, **held by:** Kier Facilities Services Limited

At: Baglan Way, Port Talbot, SA12 7BX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/01/2025 between 10:00 and 13:00.

Parts of permit assessed: Waste compound and waste acceptance.

NRW Lead Officer: Linda Warrick.

Report sent to: Nicola Thomas, Technical Competent Manager, on 12/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C3 Minor	1.1.1
W2F - Waste - Operations - Technical requirements	C3 Minor	2.5.6

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
W1A	Actions identified in the PAAs require implementation	28/02/2025
W2F	Gypsum waste should be segregated in gypsum only containers and should not be placed in the infectious orange bag waste	28/02/2025

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.

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

This is my second visit to the site since Nicola Thomas has taken over from Pete Jones.

The site is well run. Pre acceptance audits (PAAs) are undertaken by Natural UK on behalf of Swansea Bay Health Board (SBHB).

Nicola Thomas from Plan B, acting on behalf of Kier, is the TCM for the site. Nicola has a level 4 TSH. The site is a registered hazardous waste premise - the number is CAV907 and this expires on the 31/10/25.

Pre Acceptance

Pre acceptance audits are the assessment of the characteristics of the waste to ensure the disposal or recovery method for the waste is compliant and appropriate. Over a three year audit cycle wards and departments must be audited. Natural UK currently provide the PAAs for the hospital. They are of a good standard and comply with the guidance set out in HTM 07-01, the only concern is that these audits must include the wards and departments as well as the waste holds and waste compound.

It is also important that all community hospitals provide PAAs to ensure the waste is properly categorised.

Waste Acceptance

Waste acceptance from the hospital has improved in recent months. Nicola and her team have worked hard to increase awareness to ensure sharps containers are signed and dated prior to disposal in the waste compound.

Bag tagging does occur however the system to trace the bags is currently not running. This should be re-introduced to ensure bags can be traced back to the department of origin.

Tiger bags are being used across the hospital and this is working well, with many bags seen in key areas around the hospital to ensure offensive healthcare waste such as non-infectious PPE, couch rolls, hand towels etc are correctly classified.

There is an issue with plaster casts containing Gypsum waste being currently placed in the orange infectious waste bags. Separate boxes should be provided immediately for this waste due to the impact it potentially has if sent to the wrong treatment facility. Key areas in Neath Port Talbot are Fracture clinic (training purposes), Minor injuries and Outpatients 2.

There are no yellow bags produced on site for medicinally contaminated infectious waste (IV bags and tubing etc) Consignments leaving the site are not dual coded indicating that

this waste is not being produced. Please ensure that medicinally contaminated infectious waste is placed in the correct waste stream and is dual coded with immediate effect. Mixing this waste in the orange bag waste stream could result in potential impacts and inappropriate treatment/disposal of this waste.

Waste Compound

Segregation of waste in the compound is very good. All areas were clean with good housekeeping evident. The impermeable pavement is to a good standard. The site is enclosed and secure and locked when not in use.

At the time of the inspection there were no non hazardous medicines stored in the yard. Pharmacy store the returned and out of date medicines from the hospital. On inspection of the pharmacy waste hold it was noted that the containers with non hazardous medicine waste did not have blue lids. The lids were yellow with a red sticker denoting that they contained 18 01 09 medicines only. Please ensure this is rectified immediately.

There were yellow bags labelled medicines only stored loosely in the pharmacy hold. These should be stored in containers. Staff stated that the medicinal waste is stored in the pharmacy hold for security and then transferred to the waste compound on the day it is being removed from site.

On reviewing the consignee returns there were no dual coded medicinally contaminated sharps waste leaving the site 18 01 03 and 18 01 09. Please ensure future notes include dual codes for both non hazardous and hazardous medicinally contaminated sharps waste.

All wheelie bins were labelled appropriately and locked. The signage in the waste compound is out of date and requires updating in line with HTM 07-01. Please ensure this is done immediately.

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.

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – 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.

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 to 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.