

## Compliance Assessment Report CAR\_NRW0047919

**Permit being assessed:** YP3795FR.

**For:** Singleton Hospital Clinical Waste Transfer Station, **held by:** Abertawe Bro Morgannwg University Local Health Board

**At:** Swansea, SA2 8QA.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 02/04/2025 between 14:00 and 16:00.

**Parts of permit assessed:** Waste acceptance and storage.

**NRW Lead Officer:** Linda Warrick.

**Report sent to:** Howard Stephens, Technical Services Manager, on 11/04/2025.

### 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 (a)        |
| W1C - Waste - Management - Avoidance, recovery and disposal of wastes produced by the activities | C3 Minor          | 1.2.1 (c)        |

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      | Plan and Introduce a phased implementation of a non infectious waste stream | 14/07/2025  |
| W1C      | Introduce an offensive waste stream                                         | 14/07/2025  |

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

LW met with HS and two new estates environmental officers Ewan and Richard. The weather was dry and sunny.

The new officers have recently been appointed and are currently gaining an understanding of the issues and the controls required to aid the Health Board is compliant with current environmental legislation.

We discussed SBUHBs current waste segregation at Singleton Hospital. The Health Board needs to address all the issues with waste classification and segregation to ensure the waste acceptance at the permitted transfer station at Singleton Hospital is compliant. The introduction of an offensive waste stream will help non compliance with the mixing of hazardous and non-hazardous wastes could. The continued lack of offensive waste stream could have a number of detrimental impacts. It is important for the Health Board to understand the knock on effects of the current mixing of hazardous and non-hazardous clinical waste to the downstream treatment and disposal sites as well as the overtreatment and energy issues that arise from this.

Action: Please provide a phased approach to introducing tiger bags (offensive waste 18 01 04) by the 14th of July.

After discussions in the office, we visited the transfer station. The compound is secure and locked when not in use. There is minimal signage within the compound. The waste containers are stored outside on an impermeable pad. Drainage goes to foul sewer. There is a spill kit which is accessible, clearly labelled and well stocked.

Waste types observed at the time of the inspection comprised:  
18 01 03 HA (Anatomical waste).

The majority of the rigid containers had red lids. There was one yellow lidded limb bin. One of the containers was dated the 01/04/24 which means this waste has been on site for 24hrs which is the maximum prior to movement off site unless the waste is stored in a refrigerated unit. I was assured that delivery was that day and that all anatomical waste is moved off site in this timeframe of 24 hours or 72 hours over a weekend.

Action: Please identify areas where HG waste is produced and provide a procedure which identifies how HA waste is managed and removed from site within the 24 hour timeframe by the 18th of April.

18 01 03(09) HS

Yellow lidded sharps containers were also stored and on observation the container information showed the date of assembly and a signature on who assembled the container. It is difficult to identify who this could be so it has been suggested that initials are put here instead as this would be easier to trace the individual. There no record of the department producing the waste only that it was produced in Singleton Hospital. The disposal signature and date were not filled in. Please ensure these labels are filled in correctly to ensure waste tracking is effective to follow up on any non conforming issues.

18 01 03 (09? 18 01 06\*? (yellow HI)

There were carts coded HI and comprised of yellow bags non hazardous medicinally or chemically contaminated infectious waste from the Pathology labs. These should be dual coded on the consignment notes leaving the site.

18 01 03 (orange H AT)

This waste stream goes for alternative treatment and must not contain any medicinal or chemical contaminated materials. One cart had tags with no tracking numbers on. It was thought that these bags were from cleaning down theatres. Please ensure all clinical waste bags are tagged appropriately to allow traceability.

The remaining containers had orange bags that were all tagged.

Action: Please forward details of ward that produced tag number KV13204035 by 18th of April 2025.

18 01 03 (08\*) HY

The carts contained purple stripped yellow bags containing cytotoxic contaminated materials. These are sent for High temperature incineration. Individual bags were tagged for traceability.

Waste that was not observed in the transfer station at the time of the site visit:

18 01 04 HG - Gypsum waste

18 01 03 18 01 09 HI - IV Treatment Wate (yellow bag/box)

18 01 04 - Offensive non infectious waste (Tiger bag waste)

Action: Please provide a list of departments and wards that produce IV treatments and Gypsum by the 18th of April.

The following root causes have been identified as Non-compliances during this site inspection and these are outlined below:

Permit Breach 1 will be scored against Permit Condition 1.1.1 (a) General Management W1A Cat 3

Improvements in the sites EMS Procedures and the Waste Management Policy is required to establish the introduction of an offensive waste stream.

Permit Breach 2 will be scored against Permit Condition 1.2.1 (c) Avoidance, recovery and disposal of wastes produced by the activities. W1C Cat 3

Introduction of the offensive waste stream to segregate non-hazardous and hazardous wastes will help minimise the impact on the environment and reduce overtreatment.

LW left site at 16:00 hrs.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of 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.

**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](mailto: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](mailto: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.