

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	24/09/2019	Time in	14:00	Out	15:20
Assessment type	Audit				
Parts of the permit assessed	Paperwork/storage area				
Lead officer's name	Warrick, Linda				
Accompanied by					
Recipient's name/position	Bob Sealey/ Site supervisor	Date issued	16/10/2019		

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
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.		

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Present

Linda Warrick - NRW

Bob Sealey - Veolia

The permitted site is run by Veolia on behalf of Swansea Bay Health Authority. The hospital at Baglan is a privately funded initiative (PFI).

TCM

At the moment there is no suitably qualified TCM on site (Amanda Hayes was the previous TCM) however Bob Sealey has informed me that Jon Hawkes of Natural UK is covering for the site.

Actions

1. Please can you forward the confirmation letter from Jon Hawkes and his attendance details.
2. Please can you send me the registered premise details for the site.

Consignment notes

Consignee returns need to be completed for all infectious healthcare waste that is delivered from any external clinics. It is important to stress the requirement to dual code medicinally contaminated sharps to ensure the appropriate onward treatment and/or disposal.

Edmundson take away waste electrical equipment. The consignment note I reviewed had an exempt premise code which is incorrect, the SIC code was also incorrect and there were issues with the description and ewc codes on the note.

Action

1. Please ensure the correct premises codes are being used on consignment notes. Your EMS needs to address this and procedures put in place to ensure these details are checked before forms are signed.
2. Set up a returns register for all hazardous waste consigned out of the site and ensure returns are completed for hazardous waste entering the facility.

Pre Acceptance

Pre acceptance checks are undertaken on all clinics to ensure the statutory requirement of the hazardous waste regulations are adhered to.

Action

1. Please can you provide details of the pre acceptance audits undertaken on the clinics prior to the acceptance of healthcare waste into the facility.

External Storage Areas

There were 2 rusted drums in the storage compound. These were not labelled.

The bin wash was not working so the current practice is to pressure wash the bins with water.

On inspection of the orange bags for ongoing treatment there were a number of items that would not be classified infectious. Cardboard packaging.

Anatomical waste can sometimes be left in the eurocarts for 5 days before it is collected. There is no refrigeration facility for this waste. Odour checks are taken on a weekly basis.

Action

1. Please ensure the rusted drums are tested and removed to a suitably authorised facility. Any consignment notes raised for the removal of this waste should be forwarded to myself.
2. Please ensure a suitable disinfectant is used for any future bin washing activities.
3. Follow up with clinics and wards the segregation policy in the trust.

There have been a number of significant issues in the clinical waste industry over the last 18 months. NPT hospital have stated that currently they have not been affected by this. At the time of the inspection the storage area was well organised with plenty of room for further storage capacity.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035733**

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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.

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			

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. 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.