

Compliance Assessment Report CAR_NRW0037309

Permit being assessed: WP3636ZG.

For: Wrexham Clinical Waste Treatment Facility (HDU & TS), held by Tradebe Healthcare National Limited

At: Tradebe Healthcare HDU & TS, Marlborough Road, Wrexham Industrial Estate, Wrexham, Wrexham, LL13 9RJ.

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

On 11/01/2021.

Parts of permit assessed: Hazardous Waste Consignment note audit

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Janine Scott, Site Manager on 22/01/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	C4 No impact	1.1.1 (a)
C2 - General Management - Management system and operating procedures	C4 No impact	1.1.1 (b)

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

Total number of non-compliances recorded	Total non-compliance score
2	0.2

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	Submit training records by 22/02/2021	22/02/2021
C2	Review waste acceptance procedures	22/02/2021

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

HAZARDOUS WASTE CONSIGNMENT NOTE AUDIT REPORT

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Date of Audit: Between 27 November 2020 and 11th January 2021

Officers Completing Audit:
Kathryn Bradshaw (Officer 2- Hazardous Waste Regulation)

Tradebe Officers:
Janine Scott (Site Manager)

Introduction

In November 2020 Natural Resources Wales requested copies of two days of hazardous waste consignment notes from Tradebe at their Wrexham site.

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

The hazardous waste audit has been carried out:-

- To measure compliance with the regulations;
- To make sure that hazardous waste is managed properly without polluting the environment or harming people's health or seriously affecting the local area;
- To make sure that registers and records, such as quarterly returns from sites that receive hazardous waste are accurate.

Our purpose was to review the company's compliance with environmental legislation and where appropriate to provide advice and guidance to assist in identifying and delivering improvements.

Audit Findings

The main findings of the audit are set out in the following sections. These will be followed by either **Actions** or **Recommendations**.

Actions indicate that we are requiring you to deliver this to meet your legal obligations. In general, these will tell you what you must do, not how to do it. These are not optional, and will normally be supported by:

- a timescale, within which the action must be delivered; and/or
- interim measures, that must be taken until such time as the action is delivered.

Recommendations are not themselves requirements and typically provide further advice and guidance on:

- how to deliver a required **action**, for example we might indicate how another company has successfully dealt with this issue.
- aspects of best practice;
- potential improvements that reduce the risk of problems occurring in future.

1. Hazardous Waste Consignment Note Part A

This section was found to be fully completed and correct for all the notes that were inspected.

2. Hazardous Waste Consignment Note Part B

This section describes in detail the type and amount of waste that has been produced for collection.

Weights were missing on all the notes issued by Tradebe, although the number of containers were included.

Notes issued by West Midlands Ambulance Trust, some weights were missing on Part B, including note numbers:

WESTMI/36014

DEVIKA/DR079

On some of the notes container types and quantities were completed and on others they were not completed.

On some notes there was no detail entered for the types of waste collected, no container numbers or weights. An example is consignment note **LEYPCS/07589**.

Actions

Hazardous Waste Consignment Note Part B

You must:

- Ensure the consignor completes this section detailing what types, quantities and weights of waste were collected.

Timescale Immediate

3. Hazardous Waste Consignment Note Part C

This is the carrier's declaration, the majority of the consignment notes from West Midlands Ambulance Trust were missing times of collection.

All of the other consignment notes issued by **Tradebe, Knights Transport Solutions Ltd, Time Right Ltd, Hargreaves (UK) Services Ltd, Richard Edwards Haulage Ltd and Sharpsmart Ltd** were all fully completed.

Actions

Hazardous Waste Consignment Note Part C

You must:

- Ensure the consignor completes this section fully including the time of collection.

Timescale Immediate

Recommendations

Hazardous Waste Consignment Note Part C

To assist with compliance, we recommend:

- That you contact the operators who are not fully completing their consignment notes and remind the operators to fully complete their notes

4. Hazardous Waste Consignment Note Part D

This is the consignor's declaration and although this section has been completed on most of the notes, the notes from West Midlands Ambulance Trust were frequently missing times of collection. Some of these notes were also missing names and signatures

A small number of notes issued by Tradebe were missing names and signatures on this section.

BURSLE00033 is an example.

Actions

Hazardous Waste Consignment Note Part D

You must:

- Ensure the consignor completes this section before the waste is removed.

Timescale Immediate

Recommendations

Hazardous Waste Consignment Note Part D

To assist with compliance, we recommend:

- The consignor enters their full name, date and time themselves or where this is not possible, they verbally give this information to the carrier to input before they sign the declaration.

5. Hazardous Waste Consignment Note Part E

This section is completed by the consignee when the waste arrives at the facility for recovery or disposal. This section was not completed on all the notes from West Midlands Ambulance Trust. Only a signature, date and vehicle registration was present in this section for all of these notes.

An example is consignment note code **DEVIKA/DR079**.

For all other consignment notes this section was completed apart from a few discrepancies on the disposal codes from Part E compared to the returns.

An example is consignment note **BOLTON/000J4**.

There was also a few discrepancies on the EWC codes from the Part E compared to the consignee returns. An example is **THEROB/TR04M**. The Part E stated 37.8 Kg of 18 01 03 was for D10 disposal, however this was not submitted on the returns.

Actions

Hazardous Waste Consignment Note Part E

You must:

- Ensure the consignee completes this section.

Timescale Immediate

Recommendations

Hazardous Waste Consignment Note Part E

To assist with compliance, we recommend:

- Ensure that all staff who are responsible for waste acceptance are suitable trained in the correct procedures and are familiar with their responsibilities under the Hazardous Waste (Wales) Regulations 2005 (as amended) in relation to the completion of consignment notes.

Summary

Hazardous Waste (Wales) Regulations 2005 (as amended).

Implementation of the actions identified must be carried out to comply with the Hazardous Waste (Wales) Regulations 2005 and that the consignors are aware of the declaration they are signing.

Permit Conditions 1.1.1 (a) & (b)

There is an issue with all the notes from West Midlands Ambulance Trust which was highlighted previously on CAR-NRW0034576 issued on 07/02/2019.

In response to it being raised you provided a procedure THC 108e - Consignment Note Completion and rejection plus training registers to show staff had received tool box talks on the correct procedure.

This procedure is not being followed for the West Midlands Ambulance Trusts consignment notes particularly on Part E.

It also mentions more generally in your document THC 108 – On Site Waste Acceptance and Rejection in Section 3.1:

On arrival at site each delivery and its paperwork will be inspected before being accepted or rejected

Section 3.2.1:

Checks should include

The documentation is complete and accurate

In CAR-NRW0034576 it was mentioned that this producer (West Midlands Ambulance Trust) produces a large number of consignment notes, accompanied by a bulked waste on a single load and is impossible to produce individual weights associated with each note.

But it was also stated that a new weighbridge was being installed which would assist with this process.

Breach of condition 1.1.1 (a) & (b) scored two category 4 scores

Actions

1) Review your waste management acceptance procedures and forward to NRW, **action due by 12/02/2021**

2) Provide training records for all staff that are involved in waste acceptance procedures and completing consignment notes and forward to NRW, **action due by 12/02/2021**

3) Provide an update to NRW on how you are going to manage bulk loads from West Midlands Ambulance Trust in the future **action due by 12/02/21**

Once all of the actions have been completed I will undertake another follow up consignment note audit to ensure all of the notes are being completed correctly.

Thank you for your time.

Kathryn Bradshaw

Hazardous Waste Regulation Officer

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.