

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

Site	Wrexham Clinical Waste Treatment Facility (Incinerator)	Permit Ref	WP3836ZF		
Operator/Permit holder	Tradebe Healthcare National Limited				
Regime	Installations				
Date of assessment	06/02/2019	Time in	10:00	Out	12:35
Assessment type	Audit				
Parts of the permit assessed	Hazardous Waste Consignment Note Audit				
Lead officer's name	Kelk, Matthew				
Accompanied by	Challender, Paul				
Recipient's name/position	Vince Norris/ Site Manager	Date issued	07/02/2019		

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
C1 - General Management - Staff competency/training	C4	2.3.3
C2 - General Management - Management system and operating procedures	C4	1.3.1

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.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	0.2
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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

An audit of Hazardous Waste/Special Waste Consignment notes was undertaken by Industry Regulation Officer Matthew Kelk and Waste Regulation Officer Paul Challenger on the 6 February 2019.

Consignment Notes were audited for the month of December 2018.

The following information was found to be missing from the consignment notes:-

West Midlands Ambulance Service Trust - missing weights and EWC codes in part E of the consignment notes.

It was accepted that a large number of consignment notes accompanied bulked waste on a single load from the above producer and it would be impossible to produce individual weights associated with each note.

PCS - Weights were missing in part A and Part E of the consignment notes.

Sharp-smart - Information missing from part E of the note.

NHS Scotland - Special Waste Consignment Notes provided, missing information from various part of the notes

It was discussed with Vince Norris that recent meetings had been held with the various parties to ensure that notes were filled in properly. In addition to this toolbox talks has been held internally within Tradebe about the completion of consignment notes.

Paul Russell from Tradebe produced several recent Special Waste consignment notes for medical waste originating from NHS Scotland from the last 2 weeks and it could be seen that the notes were now being filled in correctly. A new weighbridge is being installed on site which in the next 7 weeks which will assist in filling in part E of the consignment notes.

Condition 1.3.1

Without prejudice to the other condition of this Permit, the Operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this Permit.

Condition 2.3.3

All staff shall be fully conversant with those aspects of the Permit conditions which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.

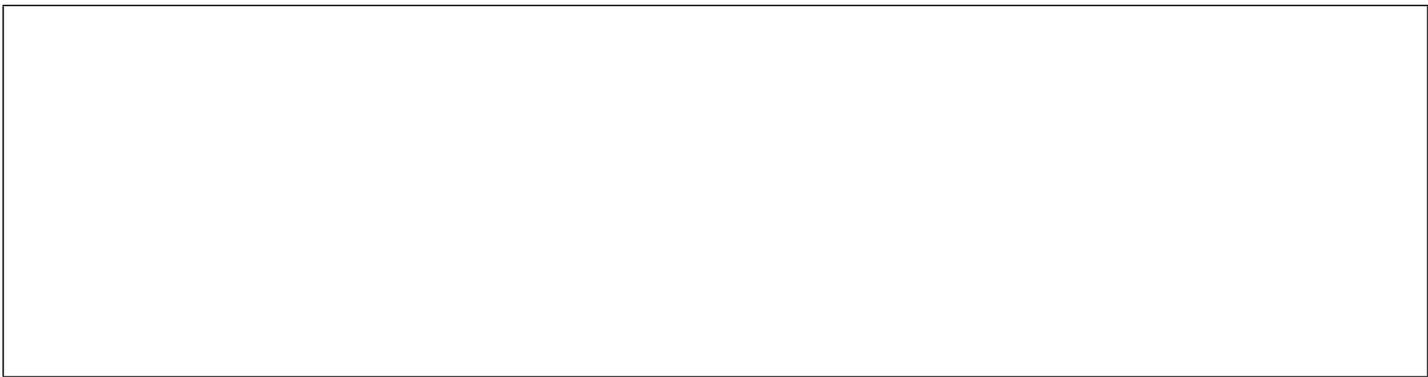
Evidence that EMS procedures and training were not sufficient to ensure that Hazardous Waste/Special Waste consignment notes were properly completed.

Action

Tradebe to review EMS procedure for completion of consignment notes and forward to NRW by 7 March 2019.

Forward logs of training (toolbox talks) to NRW by 7 March 2019.

Breach of condition 1.3.1 and 2.3.3, scored 2 category 4 scores.



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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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

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			
C1	C4	See text for details.	07/03/2019
C2	C4	See text for details.	07/03/2019

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.