

Compliance Assessment Report

Report ID:
CAR_NRW0032057

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

Site	Denbigh Bolus Plant EPR/JP3535SG	Permit Ref	JP3535SG		
Operator/Permit holder	Telsol Ltd				
Regime	Installations				
Date of assessment	17/08/2017	Time in	10:00	Out	12:00
Assessment type	Audit				
Parts of the permit assessed	1.3, 2.1, 2.3, 2.6, 2.7, 4, 5				
Lead officer's name	McClymont, James				
Accompanied by					
Recipient's name/position	Sharon Griffiths/ Technical – General Manager	Date issued	21/08/2017		

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	X	

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

1. Plant familiarisation / process walkthrough

The site is currently on a shut down until September 2017, due to a breakdown on the sinter plant.

The glass production, bolus production and store rooms were inspected. Housekeeping was good throughout the walkover.

The kiln was not in operation during the visit. It was confirmed that the afterburner temperature is maintained above 800°C, and that the temperature is validated using a separate recorder every 3 months.

2. Containment measures

Containment measures for methylene chloride, camphor, cobalt oxide, sodium selenite, cupric acid, magnesium metaphosphate and sodium poly phosphate were inspected and found to be compliant.

3. Business overview & update

Staff numbers have remained relatively consistent, currently at 14.

A number of maintenance and improvement actions are being undertaken during the current shutdown.

Dust filters on the abatement system have been replaced during the shutdown.

A new digital control panel is to be installed for the kiln, including a digital display for the afterburner temperature. This control panel will be linked via a cable to the site office, where the outputs can be reviewed in real time both in the office and remotely, potentially being fitted with an alarm system for out of hours.

A new Centra water filtration system has been installed in the QC laboratory, which is currently being commissioned.

LED lights and new windows have been installed throughout the facility, and the roof has been upgraded. There are plans for a new roof on the warehouse. The gas boiler has been replaced with a more fuel efficient boiler. The refrigerant has been changed in line with current regulations, and there are plans for a new refrigeration plant.

New preventative maintenance software, PEMAC, is currently being trialled at a Bimeda plant in Ireland prior to potential use on site.

4. Training records

Training records were inspected. New staff receive training regarding the requirements of the

Permit, with evidence of this stored within the Environment section of their training record.

5. Waste management

No controlled waste has been disposed in 2017 to date.

An annual waste transfer note is used for the general waste consigned off site. A Duty of Care and Annual Waste Transfer Note from CAD Recycling, dated 23/03/2017, was provided.

6. Environmental Management System

The complaints procedure was reviewed (QP-006 Rev 6, dated 13/10/2015). This procedure covers customer complaints regarding the finished product, but does not provide specific instructions regarding the receipt of complaints concerning the Permitted Installation's effects or alleged effects on the environment, as required by Permit conditions 2.3.7 & 2.3.8.

ACTION 1: Please submit a procedure covering the requirements of Permit conditions 2.3.7 & 2.3.8 regarding incidents and complaints, by the 30th of September 2017.

As was noted in CAR_NRW0031265, annual returns were due 31/01/2017 and submitted 08/02/2017. There should be a procedure in place to allow for reports to be submitted on time and in accordance with the requirements of condition 4 Reporting.

ACTION 2: Please submit a procedure covering the requirements of Permit condition 4, Reporting, by the 30th of September 2017.

There also appears to be no specific procedure regarding notifications to NRW, although this is covered in the Permit training. There should be a procedure in place to allow for NRW notification of pollution incidents.

ACTION 3: Please submit a procedure covering the requirement of Permit condition 5, Notifications, by the 30th of September 2017.

END

EPR Compliance Assessment Report

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Operator/Permit holder	Telsol Ltd	Date	17/08/2017

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			
G4	X	See comments section	30/09/2017

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.