



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

EPR Compliance Assessment Report

Report ID: BK3638IF/0188843

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

Site	WREXHAM ALUMINIUM PROCESSING EA/EPR/BK3638IF/V002		Permit Ref	BK3638IF	
Operator/ Permit holder	HYDRO ALUMINIUM DEESIDE LTD				
Date	09/09/2013		Time in	10:00	Out 15:30
What parts of the permit were assessed	Operator Monitoring Assessment - Emissions to Air (A1, A12 & A13)				
Assessment	Audit	EPR Activity	Installation	X	Waste Op
Recipient's name/position	Joel Priest (QHSE Manager)				
Officer's name	Stuart Ross, Beth Voice		Date issued	12/09/2013	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	A	
	3. Maintenance records	A	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded

0

Total compliance score

(see section 5 for scoring scheme)

0

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed/enforcement response

OK FOR PUBLIC REGISTER

82

10-10-13

COPIED TO PUBLIC REGISTER

JB

EDRM

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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and completed within 14 days of an assessment.

This Compliance Assessment Report follows an Operator Monitoring Assessment (OMA) audit for emissions monitoring. The audit covered emissions to air only - permitted emission points A1, A12 & A13.

No permit non-compliances were identified.

An OMA score of 97% was achieved - monitoring is being managed and completed to a high standard providing reliable data.

Please refer to the OMA report template for further detail and scores.



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

Site	WREXHAM ALUMINIUM PROCESSING EA/EPR/BK3638IF/V002	Permit	BK3638IF
Operator/ Permit	HYDRO ALUMINIUM DEESIDE LTD	Date	09/09/2013

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: BK3638IF	Compliance Officer: Stuart Ross & Beth Voice	
Operator: Hydro Aluminium Deeside Ltd	Auditor (if different):	
Emission Point(s): A1, A2 & A13	Others Present: Joel Priest	
OMA Sections	SCORE	
OMA 1 – Management of monitoring	100%	
OMA 2 – Periodic monitoring and test laboratories	95%	
OMA 3 – Continuous monitoring	91%	
OMA 4 – Quality assurance	100%	
	OVERALL SCORE	97%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The assessment found that emissions monitoring is managed and completed to a high standard in accordance with the site's Environmental Permit and associated monitoring standards. Monitoring data is therefore reliable and representative of emissions. To achieve the maximum possible OMA score, the monitoring platforms for emission points A1 & A12 would have to be modified to meet the full requirements as detailed in Environment Agency technical guidance note M1. The monitoring platforms are satisfactory. No corrective actions required		
Date of audit: 09-09-13		
Signed: 		
Date: 12-09-13		

OMA Report – Emissions to Air - EPR

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	Comprehensive monitoring procedures form part of the site's EMS. Procedures cover relevant aspects and are available to staff.
B. Organisational structure for monitoring	5	Works and QHSE Managers responsible for monitoring as defined in the site EMS. Sufficient resources in place.
C. Schedules and planning of monitoring, including contingencies	5	Detailed schedule in place for periodic monitoring. Maintenance & calibration of PCME included.
D. Monitoring records and use of monitoring data	5	PCME (particulate matter) CEMS data is downloaded and reviewed monthly. Approach to limit alarms in place in operations control room along with appropriate procedure.
E. Understanding the requirements of the permit and monitoring methods	5	QHSE manager demonstrated a comprehensive understanding of monitoring requirements and methods. Monitoring requirements are fully implemented.
OMA 1 – SCORE	25/25	100%
SUMMARY COMMENTS FOR OMA 1		
No further comments.		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	3	The sampling platforms for emission points A1 and A12 are not compliant with TGN M1 insofar that platforms are not wide enough to allow a full traverse of the stack.
B. Certification of equipment	5	Periodic monitoring equipment MCERTs certified – monitoring performed by MCERTs accredited test laboratory.
C. Measurement methods and standards <i>Critical element</i>	5	Methods relevant to determinands of interest and are in accordance with permit requirements. Test laboratory schedule of accreditation reviewed.
D. Calibration methods <i>Critical element</i>	5	Sampling & analytical equipment calibrated – monitoring performed by MCERTs accredited test laboratory.
E. Frequency of maintenance and calibration	5	Periodic monitoring completed by MCERTs accredited test laboratory. Frequency of maintenance and calibration periodically audited by QHSE Manager.
F. Reliability of equipment (data availability)	5	Periodic sampling required twice per year. No reliability issues. Emissions data always supplied as required.
G. Breakdown response	5	Periodic sampling required twice per year. If a breakdown occurs there is sufficient time available to re-sample. Emissions data always supplied as required.
H. Traceability	5	Samples analysed at UKAS / MCERTs accredited laboratory.
OMA 2 – SCORE	38/40	95%
SUMMARY COMMENTS FOR OMA 2		
Platforms A1 and A12 are not compliant with EN 15259 and as such do not provide for compliance with standards that require monitoring across two right angle planes within the stacks. All emissions test reports show that test laboratories were only able to measure from a limited number of points at each of the two stacks. Ordinarily we would require that the monitoring platforms are upgraded to meet the requirements of EN 15259 (as per TGN M1). However the operator has previously stated that the location of the accessible sampling positions provides for laminar homogenous gas flows and therefore		

even a reduced number of sampling locations could still provide representative sampling. There is evidence in the test reports to support this.

A one off investigation was completed by ESG on 25-26 June 2013 for emission point A12 by constructing temporary scaffold to extend the permanent sampling platform. This allowed for a full traverse of the stack and a comparison of results against historic data.

The exercise confirmed that gas flows are homogenous across the sample plane and emissions concentrations were typical. This supports previous findings.

Therefore, whilst the emissions platforms are not strictly compliant with the required standards, all the evidence provided to date strongly indicates that they do allow for representative sampling and they are therefore deemed satisfactory.

OMA Report – Emissions to Air - EPR

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	4	PCME particulate monitors suitably located. However sampling facilities do not fully comply with TGN M1. Refer to comments in section 2.
B. Certification of CEMs	5	PCME DT780 particulate monitors MCERTs certified.
C. Calibration methods <i>Critical element</i>	5	PCME particulate monitor calibrated using appropriate extractive sampling methods.
D. Frequency of maintenance and calibration	5	Calibrated and serviced annually as per manufacturers recommendation. ESG / PCME calibration certificates provided for past 3 years. Additional in house maintenance checks made quarterly.
E. Reliability of equipment (data availability)	5	Equipment is very reliable. Results produced >95% of the available time. No gaps evident in data viewed.
F. Breakdown response	3	The manufacturer does not support maintenance of this model. A suitably experienced contractor maintains and calibrates CEM and holds an inventory of recovered spares. Contractor is based in the local area and can generally respond within 48 hrs.
G. Traceability	5	CEM maintenance and calibration records maintained. Appropriate standard reference methods used for calibration. Records maintained.
OMA 3 – SCORE	32/35	91%
SUMMARY COMMENTS FOR OMA 3		
No further comments..		

OMA Report – Emissions to Air - EPR

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	ESG are currently contracted to carry out sampling and analysis – MCERTs accredited test laboratory.
B. Internal data quality control	5	Continuous and periodic monitoring data reviewed by QHSE Manager. Continuous emissions data reviewed monthly.
C. Competence of monitoring personnel	5	ESG are MCERTS accredited. Recent SSP reviewed. Provides Level 1 and 2 staff with appropriate technical endorsements. Calibration and maintenance of CEMs conducted by a suitably experienced contractor.
D. Auditing of monitoring	5	Documented audit procedure / proforma in use for auditing of personnel, methods, SSP and equipment etc.
E. Audit compliance	5	Audits have not identified any issues to date. Any actions arising are managed by QHSE Manager.
F. Reporting	5	Reporting as per permit requirements. No issues noted.
OMA 4 – SCORE	30/30	100%
SUMMARY COMMENTS FOR OMA 4		
No further comments.		