

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

Site	Bridgend Engine Works EPR/BL2548IF	Permit Ref	BL2548IF		
Operator/Permit holder	Ford Motor Company Ltd				
Regime	Installations				
Date of assessment	27/03/2019	Time in	10:00	Out	13:15
Assessment type	Audit				
Parts of the permit assessed	See Agenda				
Lead officer's name	Jenkins, Nicholas				
Accompanied by					
Recipient's name/position	Brett James/ Plant Environmental Control Engineer	Date issued	13/05/2019		

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
C2 - General Management - Management system and operating procedures	A	
F1 - Amenity - Odour	A	

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

Attendees

Mark Thomas - Manufacturing and Plant Engineering Area Manager - Ford Motor Company Ltd
Brett James - Environmental Control Engineer - Ford Motor Company Ltd
Dan Preece - Senior Plant Engineer - Ford Motor Company Ltd
Ian Thomas - Boiler House Operative - Ford Motor Company Ltd (Only present during boiler house visit)
Nick Jenkins - PPC Officer - Natural Resources Wales

Agenda

- Review of Action/Recommendations from CAR_NRW0033100 23 March 2018
- Update on deregulation of boiler house
- Review of recent complaints(s) including:
 - Ford's procedures for dealing with complaints
 - History of complaints received by Ford Bridgend
- Site Tour
- AOB

Conclusion

Ford business in Europe is being transformed in an attempt to "best support a long-term sustainably profitable business" (Ford's group vice president) with the effects of this seen in Ford Bridgend. The closure of two of its three operating lines within two years will see the plant reducing in operational area by two thirds and inevitably a reduction in staff numbers. Consequently, Ford is reducing its reliance on the demand for hot water generated by the operation of its boilers and it is this that bring Ford under the regulation of Natural Resources Wales (NRW). Of the five boilers within the boiler house, only one is in operation with an additional unit on hot standby. To accommodate this change in demand, Ford has installed 10 Air Handling Units and over 90% of its 480 radiant heaters. This is very encouraging. However, we expected to see the implementation of a procedure created to verify the operation of the bypass software for the remaining boilers. This was not provided.

Whereas previously a surrender of the permit and the decommissioning of the boiler house was confirmed as the way forward, Ford will now consider keeping the smaller boiler (No.5) to ensure that it can still be eligible for a discount in the energy it uses under its Climate Change Levy Agreement. We will still require a surrender application if the boiler house is regulated below 50MW RTI and therefore we recommend that Ford considers the guidance attached.

Ford manages the complaints it receives but there is no procedure which specifies how it should undertake an investigation. Following a recent complaint thought to be from the boiler house, we recommend that a written procedure is created and implemented to ensure that the process is auditable.

- Review of Actions/Recommendations from CAR_NRW0033100 23 March 2018

- **Ford to implement an assurance methodology to certify the operation of the bypass software for the burners on boilers 4 and 5** - Ford has not operated the five boilers together for many years and with the installation of the direct gas fired AHU within the 'Dragon' section of the plant, Ford outlined that it is unlikely that it will ever have the demand for simultaneous firing of all boilers. Nevertheless, there is the consideration of the aggregated thermal input which has the potential to bring the site into the Large Combustion Plant Directive (LCPD). We placed the onus on Ford to produce and implement a methodology that would provide assurance that the boilers would not operate above the 50MW threshold for consideration under LCPD. This was not provided although we discussed how Ford would produce it in line with its similar control and verification procedures for other vendor-controlled areas of the plant.
 - **ACTION - Ford to produce and implement an assurance methodology to certify the operation of the bypass software for the burners on boilers 4 and 5. We expect this to be implemented by end of May 2019.**

 - **Ford to produce a timeline outlining its progress toward the decommissioning of the**

boiler house and the submission of an application to surrender its permit This was submitted 21 May, although 10 days over the deadline this was agreed with NRW. An updated plan was provided 30 November 2019. The updated plan is below:

Phase	Description	Expected Completion Date	Completed?	
1	Dragon Heating Ventilation Air Conditioning (HVAC) install	July 2018	Yes	
2	Globe HVAC Install	December 2018	Ongoing - 450/480 units installed. Existing will then be decommissioned	Existing
3	Sigma Hot Test & Facilities plant room upgrade	May 2019	On target	
4	Engine Evaluation Upgrade	December 2019	On target - Expectation that engine plant on boiler 5 with no standby.	

Whereas we had discussed the decommissioning of the boiler house with the introduction of the 4 phases (discussed above), Ford is conscious of the implications this may have on its Climate Change Levy Agreement. Under the Agreement Ford is entitled to claim a discount if it reports its energy consumption, carbon emissions and performance against their target for each of the four biennial target periods between 2013 and 2020. In light of this, Ford will consider operating boiler 5 (3.8MW) as this is the smallest onsite boiler that has the benefit of a low NOx burner. In addition, it has its own stack which has recently been repaired. NRW is liaising with the Environment Agency (as the regulator of CCLAs) to understand whether there are any implications of the CCLA with the deregulation of the boiler house. **We will provide any updates as the discussions progress.**

Deregulation of the boiler house to below the 50MW threshold has implications for the existent environmental permit in that it will need to be surrendered from the regulation of NRW. This is a process that will need to be instigated before the requirement to apply for a new permit under the Medium Combustion Plant Directive (MCPD), if this is the direction Ford Bridgend want to pursue. The timeframe for the application for the MCPD permit is likely to be January 2029. The expectation is that the boilers would be categorised as decommissioned if the gas supply to them was isolated and we were informed of the process.

Further information relating to the surrender process can be found by following the attached links:
<https://naturalresources.wales/permits-and-permissions/installations/apply-to-surrender-an-installations-permit/?lang=en> (Apply to surrender your environmental permit)

<https://cdn.naturalresources.wales/media/682296/how-to-surrender-your-environmental-permit.pdf?mode=pad&rnd=131502889290000000> (How to surrender your environmental permit)

<https://naturalresources.wales/media/1215/environmental-permitting-regulations-guidance-for-applicants-h5-site-condition-report-guidance-and-template.pdf> (Site condition report – guidance and templates)

<https://cdn.naturalresources.wales/media/685084/environmental-permitting-charging-scheme-2018->

Ford recognises that it has a responsibility to return the site to a satisfactory state in the event of the decommissioning of the site. Permit condition 2.11.1.3 requires the operator to prevent or minimise any pollution risk...on closure and decommissioning by maintaining a site closure plan to demonstrate that the installation can be decommissioned avoiding any pollution risk and returning the site of operation to a satisfactory state. There is also a requirement to review this plan at least every 4 years. Ford decommissioning plan was created 19 April 2012 and was last reviewed 08 August 2018, with no amendments. This CAR form is not an assessment of the plan.

Ford does have a Site Protection and Monitoring Plan (SPMP) and was last reviewed December 2017. Again, this CAR form is not a review of the document.

- Review of recent complaints(s) including: Ford's procedures for dealing with complaints & History of complaints received by Ford Bridgend

11 February 2019 we received a written complaint from a resident of Treoes, a village whose boundary is approximately 580m East of the boiler house, to outline that "the air has a[n] odourous smell most days which is strong" and Ford Bridgend was thought to be the source. As a response we provided air emission data which Ford supplies annually for its emissions from its boilers. To date, no further information has been received by the complainant.

18 February, we contacted Ford to advise of the complaint and on the following day we discussed the work that Ford has made in its own investigations of odour prior to the receipt of the complaint (before Christmas 2018). Ford's investigation was for a very different odour that what was reported by the complainant. Whereas we received a complaint that the odour was "strong...like something being burnt...quite potent", Ford was investigating a musty/damp odour.

The environment quality office of the Bridgend plant of which Brett James is head, receives all complaints relating to the site and these include not only odour but also noise. The plant covers a large area of Waterton Industrial Estate and the installation area regulated by NRW is small in comparison. Any environmental impacts associated with the boiler house is investigated by NRW and other impacts thought to be emanating from other parts of the whole site (excluding the boiler house) is regulated by the Local Authority.

Although we were shown details of Ford's global policies which covered environment operating systems, environmental communications and awareness etc these are not specific to the Bridgend plant as Ford aims to be consistent in the way its procedures are adopted across the world. We requested a procedure for the investigation of complaints but it would appear that Ford does not have a written procedure for such events. However, it does collate complaints, raises awareness of the complaints and investigates using the either the 4 or 8 disciplines process (4/8D). Ford does not have an odour management, nor a noise management plan and it is within these documents that investigation into complaints of this nature are documented.

It is recommended that the operator creates a documented procedure that outlines how it will investigate complaints from the permitted installation. We understand that this is likely to be site specific and the drive is away from local procedures, but this will provide reassurance that complaints are received, investigated and concluded in line with a management system which is auditable.

1. Site Tour

Weather information - To assist in Ford's investigation of complaints in particular odour, it can remotely access information from its weather station located on top of the boiler house. This information includes: temperature; humidity; light; rainfall; wind direction and pressure and provides the data in 10-minute averages. We were shown the software interface and the operator was able to provide data for a specific date. Although the purpose for the weather station is not for investigating offsite complaints, it is very useful in this aspect.

In addition, Ford also advised that it has an anemometer on top of the security lodge at the entrance to the site.

Security perimeter checks - Ford advised that G4S are used for the site perimeter checks and this is usually completed during a drive around the site. On occasions the guard will leave the vehicle if anything suspicious is found. Anything unusual including odours will be logged and fed back to the onsite control room. Although there did not appear to be any specific check for odours on the log sheets, the guard did advise that there is the opportunity to add text in the free text box.

Boiler House - We toured the boiler house and the surrounding area including the area cordoned off for land remediation and the oil tank and bund. The maintenance work on stack 5 has been completed. Ford advised that voluntary remediation of an area behind the boiler house has commenced and it is working with Pritchard's and Arcadis to remove and remediate what is believed to be historic diesel in the ground, thought to be from a spill prior to the submission of the application of the environmental permit. **Please can Ford provide updates on this in accordance with the reporting requirements of its permit.**

[END]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034877**

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

Site	Bridgend Engine Works EPR/BL2548IF	Permit Ref	BL2548IF
Operator/Permit holder	Ford Motor Company Ltd	Date	27/03/2019

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.