

**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	13/07/2017	Time in	10:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	OMA				
Lead officer's name	Taylor, Richard				
Accompanied by					
Recipient's name/position	Brett James/ Environmental Engineer	Date issued	18/10/2017		

### 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
C1 - General Management - Staff competency/training	C3	2.3

**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.

<b>Number of breaches recorded</b>	<b>1</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>4</b>
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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

### Ford Compliance assessment form

The purpose of this CAR form is to record the non-compliances to permit conditions, and actions highlighted during an Operators Monitoring Audit (OMA) which took place on 13<sup>th</sup> July 2017. This is a summary of the actions made in the OMA report sent to the site along with this CAR form. Present at the OMA were Brett James (Ford plant environmental control Engineer) and Richard Taylor (Natural Resources Wales Inspector).

The permit carries conditions under section 2.3 (Management) which require the permitted installation to be supervised by trained staff who are fully conversant with the permit, and who have had relevant training and written operating instructions. The skills and training for the post holder and the staff involved with the permit need to be held on record otherwise the site fails to meet these permit requirements resulting in non-compliances. These criterion are laid down in the site permit at 2.3.2; 2.3.3, and 2.3.4.

**Therefore NRW has found that this is a non-compliance to permit condition 2.3 where the Operator has failed to provide a job description for their role and failed to demonstrate being conversant with the permit to a satisfactory level, and not providing evidence of training. A Cat 3 breach has been applied in this case.**

Site needs to return to compliance by;

Demonstrating understanding of the permit requirements by providing a written job description for the post holder (plus deputy's) as well as evidence of training courses attended which demonstrates compliance with the permit. This would demonstrate compliance to the permit at condition 2.3.

### 1. Compliance Recommendation 1 –

- i. **Attendance on a relevant training course is recommended WEF. This would meet the requirements of permit condition 2.3.3.**
- ii. **Provision of the post holders job description – would demonstrate compliance to condition 2.3.2.**

- iii. Evidence of an in-date training matrix for personnel involved with the permit – would meet the requirements of permit condition 2.3.4.

1. Update NRW on actions above by 31<sup>st</sup> Dec 2017.
2. Recommendation 2 – Ford to identify a deputy role for the management of the Environmental permit. This would ensure the company reaches the minimum required score of 3 in the Organisational structure part of the OMA.

Observation - The monitoring should be brought forward by 2 months to build a contingency against unforeseen circumstances which would prevent the returns being submitted on time to meet the permit requirements. At present the site schedules monitoring in Dec and Jun each year. The permit requirements are for 6 monthly samples, i.e., twice per year beginning on Jan 1<sup>st</sup>. Site missed their December 16 scheduled monitoring and rearranged this for Jan 12<sup>th</sup> 2017. On this occasion, site failed to notify NRW that the monitoring results were late and were scored for this in CAR form NRW0031139 dated 15<sup>th</sup> Feb 2017. Therefore site have been warned that late reporting could incur permit breaches. At present there is no contingency built into the monitoring schedule.

**Action 1 – Re-evaluate the sampling locations are the best available with reference to TGN M1 guidance.**

**Action 2 – Site needs to justify why it continues to sample off temporary scaffolding. Sampling in this manner can only be carried out in exceptional circumstances and only when fully justified (Ref TGN M1 guidance). The permit has been in place for 14 years. Therefore site is to write a justification of the continued use of temporary platforms for monitoring as opposed to the M1 guidance to use permanent platforms.**

\*The reports for actions 2 and 3 need to be submitted before 31<sup>st</sup> Dec 2017.

There should be a systematic process and documented procedure for assessing data to determine whether it is sound and valid. Ideally this should be carried out by site personnel with a direct responsibility for the air quality monitoring as required by the site permit. Site is not directly involved with data validation to the required depth or understanding. Site needs to improve its performance by understanding the data and interrogating how it was provided. The procedure for doing this should be documented in the sites EMS.

Ford need to carry out auditing of the monitoring personnel and the lab used as part of their routine EMS. Records of this need to be kept. Non compliances must be identified, assigned to a competent person and the closure must be documented.

Ford should routinely audit their monitoring company and have this procedure documented in their environmental management system. For top marks this procedure should be assigned to a responsible person and have evidence of recent audits with identified actions closed down available.

End.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0032323**

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Site	Bridgend Engine Works EPR/BL2548IF	Permit Ref	BL2548IF
Operator/Permit holder	Ford Motor Company Ltd	Date	13/07/2017

### 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.

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	C3	<ol style="list-style-type: none"> <li>1. Compliance Recommendation 1 –               <ol style="list-style-type: none"> <li>i) Attendance on a relevant training course is recommended WEF. This would meet the requirements of permit condition 2.3.3.</li> <li>ii) Provision of the post holders job description – would demonstrate compliance to condition 2.3.2.</li> <li>iii) Evidence of an in-date training matrix for personnel involved with the permit – would meet the requirements of permit condition 2.3.4.</li> </ol> </li> <li>2. Update NRW on actions above by 31st Dec 2017.</li> <li>3. Recommendation 2 – Ford to identify a deputy role for the management of the Environmental permit. This would ensure the company reaches the minimum required score of 3 in the Organisational structure part of the OMA.</li> </ol>	31/12/2017

## 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.