

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

Site	Ford Engine Plant Bridgend	Permit Ref	BL2548IF		
Operator/ Permit holder	Ford Motor Company Ltd				
Date	24 June 2015	Time in	-	Out	-
What parts of the permit were assessed	See Below				
Assessment	Choose an item.	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Brett James Environmental Control Engineer				
Officer's name	Karen Dunn – PPC Officer	Date issued	24 June 2015		

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	A	
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	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	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	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
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 or assessed in part (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
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (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

Notification of Completion of Low NOx Burner Installation and Current Installation Status

During the last Natural Resources Wales (NRW) visit to the Bridgend Engine Plant the following action was placed on the operator:

Action: Operator to provide a formal letter notifying the regulator of when the installation of the low NOx burner took place etc. The notification should include a consolidation of the supporting evidence with respect to the permanent de-rating of one of the 12.7MW boilers e.g. boiler data sheets, calculations, information provided on e-mail (Martin Howard e-mail 24/2/15) etc. (before 31 March 2015).

NRW confirms that the operator has completed this action and suitably outlined the status of the boilers at the Bridgend Engine Plant. In meeting this action the operator provided NRW with the relevant justification and sufficient evidential material e.g. boiler certificates etc. (please refer to letter from operator dated: 25 March 2015) for NRW to examine the status of the installation in respect of the requirements of the Industrial Emissions Directive (November 2010) Chapter III Annex 5.

Current Boiler Status

Boiler	Current Status (>50MW/th IED Chapter II and EPR Part A (1))
A1/1	12.7
A1/2	12.7
A1/3	12.7
A1/4	11.18
Total Aggregate to Stack	49.28
A/2 5 th Auxiliary Boiler	4.5
Total thermal capacity of installation MW/th (input)	53.78

In short a low NOx burner has been installed in boiler number 4 de-rating it from 12.7 to 11.18 MW/th. This change reduced the net thermal input that exhausts to the common windshield (A1) by 1.52 MW/th. Therefore the total aggregate for the four boilers (numbers 1 to 4) to the one stack (A1) is now 49.28 MW/th (input).

The gas to boiler 4 is restricted by way of a software interlock and not a mechanical one and was set by the burner manufacturer at the time of commissioning. NB/ The software interlock is on the bespoke burner microprocessor and is only adjustable by the manufacturer or burner specialist. For further information in respect of the gas inputs to boilers 1 to 3 please refer to the operator's letter of 25 March 2015.

The summer or auxiliary boiler was also installed with a low NOx burner which exhausts to a separate stack (A2) giving it a rating of 4.5MWt/h (input):

The overall thermal capacity of the installation is considered to be 53.78 MW/th and remains a listed activity (Part A (1)) under the Environmental Permitting Regulations (England and Wales) 2010 (as amended). In turn the installation remains subject to an Environmental Permit against which the operator is regulated by NRW. NRW also confirms that in making this change the installation fell out of the requirements of the former Large Combustion Plant Directive.

The formal notification and evidential material from the operator has also meant that the operator was not issued with an Environmental Permitting Regulations Notice (Regulation 60) issued by NRW for further information. This notice was sent by the regulator to operators of Large Combustion Plant for the variation and update of relevant environmental permits to include the emission limit values outlined in Annex 5 of the Industrial Emissions Directive (IED). It is expected that the Ford Bridgend Environmental Permit will now be subject for review at a later date (please refer to previous CAR 5712).

Large Combustion Plant Directive (LCPD) Reporting

As requested the operator also provided NRW with the LCPD emissions data for 2014 up until the point that the installation ceased to be a Large Combustion Plant. As advised the NRW Knowledge Strategy and Planning team reviews and manages the LCPD register and emissions data on the 'Eionet' system for onward reporting to DEFRA. NRW will now manage the change on the 'Eionet' system for the Ford Bridgend installation. It is expected that the site will be completely removed from the LCPD/IED register and 'Eionet' system later in the year when the data and future reporting requirements are subject to annual review.

Conclusion

NRW welcomes the installation of the low NOx burners within two of the boilers at the Ford Engine Plant. The reduction of greenhouse gas emissions from the installation is well received and considered to be an environmental improvement. The reduction of greenhouse gases continues to be a key environmental objective for the combustion sector and NRW.

{End}

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Operator/ Permit	Ford Motor Company Ltd	Date	24 June 2015

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 a 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			
		None	

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 Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). 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.

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

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) 601 0987**.