| Cyfoeth Naturiol Cymru Natural Resources Wales | **EPR Compliance Assessment Report** | Report ID: YP3732LZ/0255183 |
|---|---|---|

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

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Site | Wrexham Cable Works EPR/YP3732LZ | | | Permit Ref | YP3732LZ | | |
| Operator/ Permit holder | Prysmian Cables and Systems Ltd | | | | | | |
| Date | 01/12/2015 | | | Time in | 10:00 | Out | 14:00 |
| What parts of the permit were assessed | Operator Monitoring Assessment (OMA) for Emissions to Water, Waste Management, Water & Energy Efficiency and Maintenance. | | | | | | |
| Assessment | Audit | EPR Activity: | Installation X | Waste Op | | Water Discharge | |
| Recipient's name/position | Andrew Watt | | | | | | |
| Officer's name | Matthew Kelk | | | Date issued | 06/01/2016 | | |

## 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 | A | | |
| | **2.** Closure & decommissioning | N | | |
| | **3**. Site drainage engineering (clean & foul) | N | | |
| | **4**. Containment of stored materials | A | | |
| | **5**. Plant and equipment | N | | |
| **c)** General management | **1**. Staff competency/ training | N | | |
| | **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 | A | | |
| | **4**. Sewer | A | | |
| | **5**. Waste | A | | |
| **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 | N | | |
| | **3**. Maintenance records | A | | |
| | **4**. Reporting & notification | A | | |
| **h)** Resource efficiency | **1**. Efficient use of raw materials | N | | |
| | **2**. Energy | A | | |

**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, **O** = Ongoing non-compliance – not scored

| **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**

**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 normally completed within 14 days of an assessment.

OMA audit carried out for emission to water from the lead extruding process.
A good OMA score of 94% was achieved, indicating that Prysmian have a high level of environmental control over emissions to water from the lead process. No breaches of permit identified.

Details and comments of the OMA assessment can be found in the attached OMA report.

Further to the OMA an inspection was carried out of the sites looking at Waste Management, Water & Energy Efficiency and Maintenance.

Waste Management

Waste minimisation from the lead extrusion process is incorporated into the site wide environmental management system objective.

All Lead containing wastes from the melting process are kept in a designated barrel next to the process - when full this container is then moved to the site waste store. The waste containers and storage areas were inspected during the site meeting and appeared fit for purpose.

Waste certificates were provided for all lead wastes leaving site.

Several EMS procedures were shown for the control of lead wastes on site - A top level procedure was provided which shows how waste streams are identified and this points to the relevant procedural documentation.
The above procedure leads to an operational control of lead waste handling procedure - site talked through how this procedure functioned.

Water efficiency

Water usage is closely monitored on site and site uses a recirculation system to ensure maximum water efficiency.
The lagoon water is topped up by rainwater capture.

Raw material storage

Areas used for the storage of raw materials were inspected, lead is kept in a large tented area external to the factory. Lead is stored in such a way that water can't get to the product, avoiding any contaminated runoff to ground or to surface water.

Energy Efficiency

Energy efficiency was discussed during the inspection, this is one of the sites main EMS objectives and is further driven by the fact that the factory is in a climate change agreement (CCA). The site has a target of 1957kWhp/tonne, site are meeting this and energy consumption per tonne is well below the target set.

Maintenance

The maintenance department was visited during the meeting, site were asked how various parts of the lead press are maintained. A computerised system is used which automatically schedules when various parts are due to be inspected. Records were shown by the engineering manager of all recent maintenance on the lead processing line.

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| Operator/ Permit | Prysmian Cables and Systems Ltd | Date | 01/12/2015 |

| **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.<br>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.