Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: YP3732LZ/0199056

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

Site	WREXHAM CABLE WORKS			Permit Ref	YP3732LZ		
Operator/ Permit holder	Prysmian Cables and Systems Ltd						
Date	21/11/2013			Time in	09:00	Out	13:00
What parts of the permit were assessed	Operator Monitoring Assessment for emissions to air.						
Assessment	Audit	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Dave Poole / Q&ESM						
Officer's name	Aled Zachary			Date issued	30/01/2014		

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	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	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	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	N	
	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, **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

OK FOR PUBLIC REGISTER — INITIALS: AZ — DATE: 3/3/14

COPIED TO PUBLIC REGISTER — INITIALS: JB — DATE: 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 normally completed within 14 days of an assessment.

Prysmian Staff present:

Dave Poole - Q&ESM
Andrew Watt - Company Quality & Environment Manager

OMA Audit of the aerial emissions monitoring from the permitted Lead Press activity.

All detailed comments regarding the monitoring provisions are detailed in the OMA report attached. No specific breaches of permit conditions were identified during the audit.

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Operator/ Permit	Prysmian Cables and Systems Ltd	Date	21/11/2013

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

Cyfoeth Naturiol Cymru Natural Resources Wales

Summary sheet	
Permit Number: **DP3338MY**	Compliance Officer: **Aled Zachary**
Operator: **Prysmian Cables and Systems Ltd**	Auditor (if different): **N/A**
Emission Point(s): **A2**	Others Present: **Dave Poole, Andrew Watt**

OMA Sections		SCORE
OMA 1 – Management of monitoring		92%
OMA 2 – Periodic monitoring and test laboratories		100%
OMA 3 – Continuous monitoring		N/A
OMA 4 – Quality assurance		90%
	OVERALL SCORE	94%

OVERALL SITE ASSESSMENT COMMENTS	Letter
	Variation
	Enforcement

The operator had an OMA last in October 2010 and this report should be read in conjunction with the previous OMA report. The previous OMA showed that the operator had effective provisions for monitoring and was utilising the same MCERTS accredited contractor as they currently employ. This OMA reviewed the changes since the last assessment, and there was evidence that the operator had improved procedures relating to monitoring and the auditing of the monitoring contractors. These changes are reflected in the current score of 94%. There are a few areas of minor improvement that the operator may consider but in general there is little more that the operator can do, apart from maintain the good standard of performance.

Date of audit: 21/11/2013
Signed:
Date: 23/01/2013

OMA 1: Management of monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Documentation of management system procedures for monitoring	5	The key procedure for monitoring provisions is PWXE 11, Issue 4 (09/06/10) This was reviewed during the audit. Prysmian's management system is accredited to ISO 14001.
B. Organisational structure for monitoring	5	In procedure PWXE 11. The Organogram shows role and responsibilities. Includes provision of deputy. Permit compliance is N°1 target of Management System objectives.
C. Schedules and planning of monitoring, including contingencies	5	Again In procedure PWXE 11. Operational control chart DCSE6 also details sampling frequency. Sampling scheduled yearly via outlook reminders. Document MS-UK-307 also details action in response to any failures. MCERTS accredited contractors who issue SSP.
D. Monitoring records and use of monitoring data	4	Monitoring results submitted to DP for review, graphed for trend analysis and presented to management. DP/AW discuss the results annually and in local management review with site manager.
E. Understanding the requirements of the permit and monitoring methods	4	No formal training schedule although DP has carried out MCERTS Awareness Training in June 2010. Groundworks trust used to keep staff informed of any changes in legislation.
OMA 1 – SCORE	23/25	

SUMMARY COMMENTS FOR OMA 1
The operator has a core procedure, *PWXE 11, Air Emissions – Lead Press* which provides for the management and control of monitoring at the site. Other supporting procedures include DCSE6 and MS-UK-307. An MCERTS accredited contractor is used to carry out sampling, any contracted monitoring is prefaced by a Contractor Minimum Requirements document that states monitoring must meet BS EN 14385, 13284 & 12619 and supervised by a MCERTS Level 2 Team Leader. This has been a prerequisit of all monitoring carried out since 2009.

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Sampling provisions *Critical Element*	5	The site has a permanent monitoring platform and sampling port that is fully compliant with TGN M1.
B. Certification of equipment	5	UKAS and MCERTS accredited contractors utilised operating to BS EN 14385:2004.
C. Measurement methods and standards *Critical element*	5	As above. ESP Environmental Ltd used to conduct monitoring who are UKAS and MCERTS accredited. SAS Labs, Sheffield used to analyse extractive samples who are also UKAS accredited. A MST 4 manual sampling train and Signal FID analyser are used for sampling.
D. Calibration methods *Critical element*	5	UKAS/MCERTS accreditation for all the required determinands.
E. Frequency of maintenance and calibration	5	Sampling reports detail sample equipment calibration dates (04/09/13 for Sampling train etc)
F. Reliability of equipment (data availability)	N/A	Only applies to CEMS
G. Breakdown response	N/A	Only applies to CEMS
H. Traceability	5	Accredited test-laboratory provides for traceability to national standards, verified through UKAS assessments.
OMA 2 – SCORE	30/30	

SUMMARY COMMENTS FOR OMA 2
The sampling platform and sampling port on the lead press extruder stack is permanent and complies with the guidance on sampling provisions. ESP Environmental Ltd who are a UKAS and MCERTS accredited are contracted to carry out the annual monitoring, which is scheduled whilst the line is in operation. Sampling is supervised by a Level 2 MCERTS qualified Team Leader and a Site Specific Protocol is provided upfront. A UKAS accredited test lab (SAS Labs in Sheffield) is used for extractative metal analysis.

OMA 3: Continuous monitoring		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. Provisions for monitoring and location of CEMs *Critical Element*	N/A	
B. Certification of CEMs	N/A	
C. Calibration methods *Critical element*	N/A	
D. Frequency of maintenance and calibration	N/A	
E. Reliability of equipment (data availability)	N/A	
F. Breakdown response	N/A	
G. Traceability	N/A	
OMA 3 – SCORE		
SUMMARY COMMENTS FOR OMA 3		
Not applicable to periodic monitoring.		

OMA 4: Quality assurance		
OMA ELEMENTS	**SCORE**	**COMMENTS**
A. External quality control schemes	5	UKAS accredited contractors and labs utilised for sampling.
B. Internal data quality control	4	Monitoring is reviewed by local and national management and is graphed / trended.
C. Competence of monitoring personnel	5	Level 2 qualified MCERTS personal is stipulated in the contractor minimum requirements document.
D. Auditing of monitoring	3	An internal audit of monitoring was carried out on 12/10/10 following recommendations from last OMA but no audit has been carried out since. No actions identified from audit, audit only focused around on-site sampling with no review of laboratories used.
E. Audit compliance	4	No issues from previous audit recorded, suggest re-audit of contractors and external labs to check for any issues.
F. Reporting	5	Contents of monitoring report meet the permit requirements, monitoring reports are submitted in a timely manner.
OMA 4 – SCORE	27/30	

SUMMARY COMMENTS FOR OMA 4

A copy of ESP's site specific protocol for monitoring (SSP) was reviewed during the audit; this is also a requirement of the contractor minimum requirements document employed by the site. ESP are an MCERTS accredited contractor with a UKAS accredited test laboratory and use UKAS accredited 3rd parties. Copies of internal graphs used to track monitoring results and monitoring emissions limits were viewed during the audit; due to the frequency of formal sampling (annually) trend analysis is not utilised. Auditing of monitoring contractors is documented in procedure PWXE 11 and has been improved since the last OMA audit, a copy of the last internal audit report was reviewed, it is recommended that future audits stretch to auditing of contractor or 3rd party labs as best practice. Dealing with non-conformances from audits is now documented in procedure 14.12 - the previous OMA recommended improvements in this area, and the operator has applied these recommendations. Monitoring reports received from the operator are submitted on time; reports from the monitoring contractor are detailed and include calculations and uncertainty values of monitoring.