Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: PP3834CB/0190932

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

Site	Ruabon Electro Ceramics			Permit Ref	PP3834CB	
Operator/ Permit holder	Morgan Technical Ceramics Limited (Morgan Advanced Materials as of 25/09/13)					
Date	24/09/2013			Time in	10:00	Out 15:00
What parts of the permit were assessed	Compliance, improvement conditions, site development, site inspection.					
Assessment	Site Inspection	EPR Activity:	Installation X	Waste Op	Water Discharge	
Recipient's name/position	Dr.Kathleen Coward, EHS Compliance Manager					
Officer's name	Beth Voice, Ian Oakes			Date issued	16/10/2013	

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	C3	2.4, 2.5
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	C3	3.1.2
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	C3	3.1.2
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
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 (no evidence of non-compliance), **N** = Not assessed, **NA** = Not Applicable

Number of breaches recorded	3	**Total compliance score** (see section 5 for scoring scheme)	12

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

	INITIALS	DATE
OK FOR PUBLIC REGISTER	SV	18/11/13
COPIED TO PUBLIC REGISTER	JB	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 completed within 14 days of an assessment.

Beth Voice and Ian Oakes from Natural Resources Wales met with the Morgan Electro Ceramics' EHS Compliance Manager, the Engineering Manager, the General Manager and the Maintenance Manager.

The main issues discussed were the effluent treatment plant, proposed site changes, the permit improvement conditions, permit breaches and process details including a site tour.

Effluent Treatment Plant (ETP)

The ETP is operated by Hydro. Effluent from the Powder Preparation Department is collected in an underground tank and then pumped to a holding/balancing tank. Effluent is then pumped to an Aggrelek electro-coagulation unit, passed through a flocculation tank and a lamella plate clarifier before being discharged to sewer. Effluent can be returned to the initial holding tank if it is out of specification before being discharged to sewer. In addition, a water polishing filter has been recently installed to allow the ETP to meet the discharge consent limits (considered to be a temporary measure).

Effluent samples taken every 6 months as required by the environmental permit were within the emission limit values (ELV's), however those taken by DCWW resulted in breaches of their discharge consent limit and the permit ELV for Pb. The operator believes the DCWW samples were potentially taken before the return line (i.e. out of spec effluent which would have been returned to the holding tank and not discharged to sewer). This sample point has been blanked to ensure that future samples are taken from the correct location.

The operator is to collate the sample results from the correct sample point to see whether the discharge is now within the discharge consent limit and the environmental permit limit. The operator discussed the provision of increasing the holding tank capacity to produce a more consistent feed to the ETP which should result in better operation of the ETP by balancing effluent concentration and increasing the residence time.

Air Breaches

The breaches for emission limit values for B6, B7 and B24 were discussed. The operator stated that permit ELV's cannot be met with the existing equipment, and that an investment of approximately £100,000 would be required. NRW requested that the operator review the Pb and PM data since records began, to include mass released. These ELV's need to be reviewed in line with BAT, actual site operation and recent monitoring results. Process optimisation should be investigated to see what emission results can be achieved. We can then agree on the ELV for these emission points which is BAT and appropriate for the site.

Improvement Conditions (ICs)

The following is a summary of actions required by the operator:

IC 1 – Operator to assess the results.

IC 2 – Operator to submit a report on how the scrubber performance will be monitored. E.g. Is there a correlation between Pb and PM from the dryers, is it possible to use PM monitoring as a surrogate Pb measurement?

IC 3 – Complete.

IC 4 - Operator to BAT assess based on H1 (already completed) and the priority emission points identified in IC 3.

IC 5 – Complete

IC 6 and S1.4 - Operator to collate the Al results from DCWW using the new sample location. Operator to analyse for Al (and Pb, not required by this IC but required for permit breach work) for worst case batch/product. The period of analysis must be of sufficient length that the results are statistically meaningful. Monitoring equipment,

techniques, personnel and organisations employed for the emissions monitoring programme shall either have MCERTS certification or MCERTS accreditation as appropriate (ref. Section 3.3.3 of permit).
IC 7 – installed March/April 2013. No vent therefore operator to state this and the IC will be complete.

IC 8 – operator to review IC 1, 3 and 5. Identify further monitoring required to characterise emissions points. Propose monitoring programme to provide sufficient data to review emissions to air and ELV's.

Other

1. Due to proposed changes in the monitoring to air and sewer, the Operator Monitoring Assessment will be carried out next year.
2. B7 is to be removed and replaced. MEC to notify NRW of this.
3. Operator to write to confirm the company has changed its name.
4. 4 presses and 4 kilns are to be added to site, to vent through one emission point. The operator should make an application to vary the permit as a minor variation and to register the new emission point.
5. PIR login details can be changed by phoning 03708 506506.

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Operator/ Permit	Morgan Technical Ceramics Limited	Date	24/09/2013

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.	X
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			
A1	C3	Improvement conditions to be submitted by 31/12/13.	31/12/13
E1	C3	Air emissions data analysis (covered in improvement conditions) to be reviewed by 31/12/13. Operator to review the Pb and PM data since records began, to include mass released. These ELVs need to be reviewed in line with BAT, actual site operation and recent monitoring results. Process optimisation should be investigated to see what emission results can be achieved.	31/12/13
E4	C3	Operator to analyse Al and Pb discharged from ETP for worst case batch/product. Data to be collected over suitable period of time sufficient to ensure data accuracy. Operator to collate the results from DCWW with new sample location. Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme shall either have MCERTS certification or MCERTS accreditation as appropriate (ref. Section 3.3.3 of permit).	31/12/13

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.