

Compliance Assessment Report CAR_NRW0040758

Permit being assessed: BM3965IA.

For: Broughton Aircraft Factory EPR/BM3965IA, held by Airbus UK

At: CHESTER ROAD BROUGHTON , CHESTER, CHESTER, CH4 0DR.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 29/11/2022 between 09:30 and 14:20.

Parts of permit assessed: SEE NOTES (Section 4)

NRW Lead Officer: Victoria Griffin, accompanied by Stuart Ross.

Report sent to: Claire Powell, Head of EHS on 21/12/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This was a prearranged familiarisation visit of the Facility by Natural Resources Wales (NRW) regulating Officers.

NRW Officers were met by Claire Powell and provided with an overview of the process and

ancillary activities. A tour of the entire facility was not possible due to time constraints; instead, a high-level tour was provided for the purpose of familiarisation and broadly included the following elements:

- An overview of Large Component Manufacturing (LCM)
- SMC
- Milling Lines
- TSA Anodising Line
- Painting and sealing
- Assembly & Equipping
- Effluent Treatment Plant

The site was well managed, ordered and tidy at the time of the visit.

Following the tour, discussions regarding proposed environmental improvements, future capacity and production requirements and the associated potential changes to the permit were undertaken. The salient points are summarised below.

Increased Capacity

Increased production capacity is forecast and as a result, new interim and final paint booths, powered by dedicated air source heat pumps are proposed in the East Factory. A permit variation application is to be submitted to NRW to cover these changes.

An additional production line is proposed for the West Factory (former A380 wing production facility) to support the increased capacity requirements. The existing West Factory paint booth is to be removed and replaced by a bespoke paint booth designed to meet production needs. The Operator is proposing to utilise one or both of the existing emissions stacks rather than creating new emission points. Bulk material storage is not anticipated at the West Factory

Dispersed Combustion Plant

The Operator has confirmed that there are approximately 37No. dispersed combustion plant, including combined heat and power (CHP) and reserve boilers across the Facility. All units are approaching their end of life and a programme of improvement and replacement will be required.

The CHP units in the West Factory will be replaced as a priority and will utilise the existing emission stacks, changes to stack heights are not anticipated. Further investigation is to be undertaken by the Operator to confirm the thermal input requirements of the replacement CHP units and the potential impact on emissions. Discussions with NRW will be undertaken with regard to ascertaining future permit requirement to address these changes.

The replacement of the remaining combustion plant will be subject to review and based on the facility capital expenditure programme and feasibility. The benefits of undertaking of review the existing CHP plant and comparison to the proposed CHP plant was discussed, perhaps comprising a form of gap analysis. Preliminary discussions with NRW regarding the CHP plant and the proposed approach to permitting are to be undertaken at the earliest

junction.

Water Supply

Investigations are underway to establish the feasibility of obtaining a groundwater supply from the underlying aquifer. The Operator is working with a specialist consultant to progress this.

West Factory Tenancy

Negotiations are being finalised for the publicised tenancy by Boccard of part of the West Factory for the purpose of steel component manufacture. Boccard will operate a standalone process, which will in no way be linked to the Operator's permitted activities. Nevertheless, clarification of Boccard's proposed activities which may require a permit and/or regulation, is being sought for completeness by the Operator.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.