

Compliance Assessment Report

Report ID:
CAR_NRW0034203

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

Site	Royal Mint EPR/KP3135KV	Permit Ref	KP3135KV		
Operator/Permit holder	The Royal Mint Ltd				
Regime	Installations				
Date of assessment	04/11/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	3.2.3 Containment of Stored Liquids				
Lead officer's name	Green, Rebecca				
Accompanied by					
Recipient's name/position	Martyn Grant/ Environmental Manager	Date issued	16/11/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B4 - Infrastructure - Containment of stored materials	X	
	X	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	X	
D2 - Incident Management - Accidents, emergency and incident planning	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

On the 5th November 2018 The Royal Mint (RM) informed Natural Resources Wales (NRW) that ~50L of 15% sulphuric acid had leaked from an IBC in Nickel Plating Plant 2 (NP2) onto the concrete floor. The spill was soaked up with spill mats and the IBC placed on a portable bund.

None of the spillage would have been able to escape outside as the NP2 building is bunded, so there was minimal risk to the environment.

The concrete floor was damaged by the acid and should be repaired and resurfaced as soon as possible. The repair is scheduled for week commencing 26th November.

Action: *Send NRW photos of repaired floor by 14th December 2018.*

RM are in the process of building a secure storage area to house IBCs containing waste solutions while they are awaiting collection by RM's waste disposal contractor.

Action: *Send NRW photos of completed storage facility by 14th December 2018.*

The existing policy for assessing IBC integrity seems to be rather informal, a fact recognised by RM, who are now in the process of drafting a more robust procedure.

Action: *Send NRW a copy of the revised procedure by 14th December 2018.*

One matter that came to light during the investigation into this spillage is a cause for concern. There were several IBCs awaiting collection by RM's waste disposal contractor. Labels are supplied by the contractor for RM to use. The collection driver checks the labels against his paperwork and if there is any discrepancy he will not remove the waste until the discrepancy is resolved. In this case some of the IBCs were not correctly labelled and so were not removed. This has happened before and questions the reliability of the waste contractor.

RM should consider carrying out an in-depth supplier audit on this contractor to ensure that their procedures controlling competence of deputies are adequate and robust.

The spillage of waste acid etch solution was unfortunate but RM were already aware of the risk and were taking appropriate action. The IBC was not old or apparently damaged so there was no reason to suspect that it might leak. Action was taken promptly and the spill soaked up. It leaked onto an impervious floor in a bunded building and so the risk of environmental contamination was minimal.

This incident does not therefore justify the issuing of a non-compliance.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	The Royal Mint Ltd	Date	04/11/2018

Section 3 – Enforcement Response

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C2	X	Formalise existing policy on IBC integrity checks. Send NRW a copy of the procedure.	14/12/2018
B4	X	Send NRW photos to confirm completion of secure storage facility for IBCs containing waste acid/alkali awaiting collection by waste disposal contractor.	14/12/2018
B4	X	Repair & resurface part of concrete floor in NP2 damaged by sulphuric acid. Send NRW photos to confirm work has been completed.	14/12/2018

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 verbally or 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 that 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 fulfil 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 (eg. 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 its service
- Freedom of Information Act/Environmental 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 fifteen 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.