

Compliance Assessment Report

Report ID:
CAR_NRW0034152

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

Site	Waun-y-Pound EPR/BX3376IG	Permit Ref	BX3376IG		
Operator/Permit holder	CONTINENTAL TEVES UK LTD				
Regime	Installations				
Date of assessment	26/11/2018	Time in	10:45	Out	15:00
Assessment type	Report/Data Review				
Parts of the permit assessed	Emissions to Sewer				
Lead officer's name	Green, Rebecca				
Accompanied by	Heather Pepper, DCWW				
Recipient's name/position	Philip French/ Head of Plating and Environmental Management	Date issued	06/12/2018		

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	
B5 - Infrastructure - Plant and equipment	X	
	X	
E4 - Emissions - Sewer	X	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	C4	2.3.6
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	1	Total compliance score (see section 5 for scoring scheme)	0.1
-----------------------------	---	--	-----

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 29th October 2018 Natural Resources Wales (NRW) received a Schedule 1 Notification from Continental Teves (CT). The zinc (Zn) emission limit value (ELV) for emissions to sewer was exceeded on 26th October 2018. The Zn concentration was measured as 4.6mg/L; the ELV is 2mg/L. A sample taken by Dwr Cymru/Welsh Water (WW) at 9:12am gave a Zn concentration of 3.2mg/L. CT estimate that approximately 1m³ of effluent was discharged with this Zn concentration, giving a total discharge of 4.6g. This amount of Zn is unlikely to have had an adverse effect on the WW waste water treatment facility and thus a minimal effect on the environment. CT immediately started an investigation into the cause of the excess Zn emission.

NRW decided that it was not appropriate to issue a non-compliance before the full results of the investigation were available and so a joint visit with WW was arranged for 26th November 2018 to discuss the root cause.

The agenda for the visit is given below -

1. Business update.
2. Toveko sand filter
 - a. Evidence of refurbishment in 2017;
 - b. Planned maintenance schedule, tasks and evidence of completion;
 - c. Conclusions and actions arising from recent (CT internal) review meeting after permit breach for Zn emissions;
 - d. Report review.
3. Settlement tank
 - a. Planned maintenance schedule, tasks and evidence of completion;
 - b. Discussion of settlement process, difficulties and improvements.
4. Effluent Treatment Plant improvements
 - a. Are the equipment improvements completed?
 - b. Review of process improvement lab trial and results;
 - c. Proposed actions;
 - d. Organisation of larger scale trial (if appropriate).
5. Site inspection.
6. AOB.

Present at the meeting -

ML, Plant Manager, Continental Teves (CT),
CD, Production Manager, Small Series, CT;
PF, Head of Plating and Environmental Management, CT;
HP, Trade Effluent Officer, WW;
Rebecca Green, PPC Compliance Officer, NRW.

1. Business Update

"Diesel-gate" and Brexit are still having a detrimental effect on business which is affecting this year's profits. However, the situation for next year is looking much brighter, with new business and some diversification planned. Changes in permanent staffing levels are unlikely.

Chemical stores have been re-located on racking next to the plating plant and the old containers will be disposed of. New flammables storage cabinets have been installed outside.

2. Toveko Sand Filter

a). Evidence of refurbishment in 2017

The work was described in an email from PF, received by NRW on 7th November 2018, and some receipts were seen.

b). Planned maintenance schedule

The planned maintenance schedule for the sand filter is thorough and comprehensive from a mechanical perspective, but it does not include any cleaning operations. Evidence of completed tasks was seen. In the past the sand filter has been cleaned quite often as a consequence of maintenance for sporadic breakdowns. It has not been cleaned since the refurbishment in 2017 and this is thought to be the reason for the recent zinc (Zn) exceedance.

c) and d). Results of review after permit breach for Zn emissions

The abnormal Zn emission was due to solids contamination on the back of the sand filter which fell off into the bottom of the sand bed and contaminated it. Regular cleaning of the sand filter should be added to its planned maintenance schedule.

Action 1: Add cleaning operation to planned maintenance schedule for the sand filter, initial frequency every 4 months. This action is complete. Frequency to be reviewed in December 2019.

3. Settlement tank

a). Planned maintenance schedule

There does not appear to be any formal planned maintenance schedule for the settlement tank. It is inspected daily on an ad hoc basis by the effluent plant operators as they are working. If the settlement fins inside the tank appear to be unduly dirty, air is blown through the tank to clean them and then the contents left to settle.

Action 2: Formalise existing inspection and cleaning processes. Procedure to be issued by 21st December 2018 and a copy sent to NRW.

b). Process discussion

The particulate contamination comes from the settlement tank and this seems to be the likely source of the problem. If flocculation is incomplete smaller particles will be carried over to the sand filter and contaminate it. Polyelectrolyte viscosity increases with decreasing temperature, thus becoming less effective because it does not mix thoroughly enough in the settlement tank. CT have installed a heat mat under the tank to maintain it at the optimum temperature, which should improve the reliability of the flocculation process. CT are sure there is unlikely to be a fire risk from the heat mat as it can only operate within a very limited heat range, but will install a thermocouple in the tank to control the temperature between 5 and 10°C.

The installation of the new PLC for the effluent plant could be used to measure the waste water flow into the treatment tank and thus to control the polyelectrolyte dosing rate in the settlement tank. This could improve the efficacy of the settlement process.

4. Effluent Treatment Plant (ETP) improvements

a). Equipment improvements

Actions from the meeting in April 2018. The peristaltic pump for hypochlorite dosing has been added to the critical spares list with a minimum stock level of one. **Action complete.**

The control of the hypochlorite dosing pump will be on a timer on the new PLC, which is not fully installed yet. **Action still outstanding. CT to advise NRW when this action is complete.**

The PLC installation, due for completion in July, is still not complete and updates were not sent to NRW or WW until requested. ***Please keep NRW and WW regularly updated on progress.***

Probe and meter improvements discussed in April will be assessed once the PLC is operational.

All operating procedures for the ETP will be updated and re-issued by 31st January 2019. CT and NRW will hold a meeting to review the new procedures before they are finally issued. It is likely that operation of the ETP will be audited by NRW some time in 2019 to check that the new procedures are being followed.

Action 3: *Send copies of new ETP operating procedures to NRW once they have been reviewed and issued.*

The new PLC will allow better control of the treatment process. It will stop transfer from the plating plant if a fault is detected and not rectified within two minutes. If the fault continues and the transfer sumps become full, the PLC will shut down the plating plant.

It will improve pH control by decreasing the dosing rate and increasing the time between additions as the pH set point is approached.

b). Effluent treatment process lab trial

There was general agreement that the lab trial carried out by the equipment supplier was rather limited. However, the results seem encouraging and the process worth further investigation.

c). Proposed actions

A production trial is planned, but no date has been suggested yet.

NRW will only agree to this trial if CT provide much more detail about the precise method and the name of the chemicals called "Decomplexant A" and "Decomplexant B" in the lab trial. Safety Data Sheets will not be accepted. The supplier can contact NRW directly should commercial confidentiality be an issue. **This information must be provided at least 14 days before the proposed start date and the trial must not begin until CT have received written confirmation from NRW that it can proceed.**

d). Organisation of production scale trial

A pre-trial meeting between CT, the equipment supplier and NRW will be arranged in the new year to discuss the trial more fully. Once the duration, method, controls and chemicals have been formally agreed with NRW the trial can begin.

The discharge will go to sewer, as normal. The treated effluent must be analysed for total metals, not dissolved as in the lab trial, before discharge to sewer. CT have agreed to carry out an analysis every two hours while the trial is running.

5. Site Inspection

The inspection concentrated on the ETP and installation of the PLC, which is nearing completion. The ETP room was clean and tidy and the sand filter appeared to be operating properly.

6. AOB

A meeting will be arranged in January to review the new ETP operating procedures and to discuss the operational details of the ETP process improvement trials.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034152**

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

Site	Waun-y-Pound EPR/BX3376IG	Permit Ref	BX3376IG
Operator/Permit holder	CONTINENTAL TEVES UK LTD	Date	26/11/2018

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			
G3	C4	Add cleaning operation to regular planned maintenance schedule for Toveko sand filter	21/12/2018
B5	X	Formalise and document informal settlement tank inspection and cleaning procedure.	21/12/2018
B5	X	Introduce additional planned maintenance operations for Toveko sand filter.	21/12/2018
E4	X	Investigate root cause of Zn exceedance and action findings.	21/12/2018

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.