

Compliance Assessment Report

Report ID:
CAR_NRW0034283

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

Site	Glascoed Munitions Factory	Permit Ref	LP3731SU		
Operator/Permit holder	BAE Systems Global Combat Systems Munitions Limited				
Regime	Installations				
Date of assessment	27/11/2018	Time in	10:20	Out	14:00
Assessment type	Unknown				
Parts of the permit assessed	Consolidation of installation, waste and abstraction permits				
Lead officer's name	Green, Rebecca				
Accompanied by	Lenthall, Susan				
Recipient's name/position	Owain Morgan/ Mechanical Services Manager	Date issued	10/12/2018		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C2 - General Management - Management system and operating procedures	A	
E3 - Emissions - Surface water	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
H1 - Resource Efficiency - Efficient use of raw materials	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
-----------------------------	---	---	---

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

BAE Systems (BAE) requested a meeting with Natural Resources Wales (NRW) to discuss some changes to their operations and the consolidation of some or all of their four permits.

BAE provided the following agenda -

1. Introduction & welcome
2. Environmental permit and abstraction permit consolidation
 - consolidate permits
 - include surface water discharge as abstraction point
3. Discharge permit - treated effluent
 - increase total daily volume
 - change instantaneous flow
4. Discharge permit - storm
 - include trade effluent in wording
 - apply explosives limit
5. Discharge permit - dry weather
 - remove dry weather flow conditions
 - increase/remove dry weather flow limit
6. AOB
7. Wrap up.

Present at the meeting -

OM, Mechanical Services Manager, BAE,
PW, PTC Supervisor, BAE,
MS, SHE Advisor, BAE,
SB, Technical Director, Environmental Compliance Limited,
Sue Lenthall, Environment Officer, NRW,
Rebecca Green, PPC Compliance Officer, NRW.

Consolidation of permits

BAE needed to discuss their plans, options and NRW's opinion. Consequently the meeting did not strictly follow the agenda above but all topics were covered in full.

It will be possible to consolidate the installation, waste and discharge permits into one Environmental Permitting Regulations 2016 compliant (EPR) permit.

Adding the Waste Water Treatment Plant (WWTP) to the EPR permit will be a substantial variation. The WWTP will become an additional activity and may increase the site's OPRA score once the consolidated permit is issued. The exact cost of the application will be calculated from the existing OPRA score for the installation times the multiplier given on the OPRA sheet. BAE will need to determine, by a full analysis, whether the input to the WWTP is hazardous so they can determine whether they need to apply for a Schedule 1 5.3 (hazardous waste treatment) or a 5.4 (non-hazardous waste treatment) activity. The sub-paragraph will depend on the threshold and treatment method used.

The discharge from the WWTP will be included in the EPR permit. The composition and flow rates presently in the discharge permit will be included as a schedule in the EPR permit and the storm sewage flow rates will also need to be included. The limits can be changed if BAE decide they want to vary them in the application. BAE are recommended to run some analytical tests on the silt in the brook both upstream and downstream of the discharge point so that they have a measure of the existing level of explosive contamination, if there is any. Discharge enters the surface water at points W1 and W2; the flow is measured at W1. BAE will need to recalculate the dry weather flow as the current value is inaccurate.

Once the new permit is issued, the discharge permit, AN0012401, should be surrendered. There is no fee for this surrender.

The waste permit for the proving oven can also be added to the EPR permit. This will be a minor technical variation, incurring a fixed fee.

The abstraction licence cannot be consolidated into the EPR permit at the moment, but this may be possible in 2020.

In the future BAE will hold one EPR permit covering the boilers, WWTP and the proving oven. They will have two profiles, one for the boilers and the WWTP and the other for the proving oven, incurring two subsistence fees. The abstraction licence will not change at present.

Future plans

BAE are proposing several changes to the way they use water on the site.

They are investigating the feasibility of recirculating the surface water collected from the site and re-using it around the site. This would have several benefits, including a significant reduction in the volume of water abstracted and the removal of explosives from the surface water discharged to the brook. NRW strongly support these proposals. If there is a significant reduction in water abstraction volumes there may be no need for an abstraction licence.

There was also some discussion about re-use of some of the discharge from the WWTP.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034283**

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

Site	Glascoed Munitions Factory	Permit Ref	LP3731SU
Operator/Permit holder	BAE Systems Global Combat Systems Munitions Limited	Date	27/11/2018

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			

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.