

Compliance Assessment Report CAR_NRW0041724

Permit being assessed: YP3732LZ.

For: WREXHAM CABLE WORKS, held by Prysmian Cables and Systems Ltd
At: Oak Road Oak Road , Wrexham Industrial Estate, WREXHAM, Clwyd, LL13 9PH.

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

On 26/04/2023 between 09:30 and 11:00.

Parts of permit assessed: SEE NOTES (Section 4)

NRW Lead Officer: Victoria Griffin.

Report sent to: Neil Young, Quality, Health, Safety and Environmental Manager on 19/05/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3 Minor	Condition 3.2.1
B4 - Infrastructure - Containment of stored materials	C3 Minor	Condition 1.1
B4 - Infrastructure - Containment of stored materials	C3 Minor	Condition 3.2.3

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

Total number of non-compliances recorded	Total non-compliance score
3	12

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?

Criteria	Action needed	Complete by
B3	See details below relating to drainage and oil water interceptors in Observations and Action 3.	30/06/2023
B4	See details regarding management of swarf in Observations and Actions 1	30/06/2023
B4	See details below regarding oil storage management in Observations and Action 2.	30/06/2023

Action criteria codes are listed in the 'Important information' section below.

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 pre-arranged visit by the Natural Resources Wales (NRW) regulating Officer. The purpose of the visit was to review and discuss the recommendations from the previous site familiarisation visit (12/12/2022) with the newly appointed Quality, Health, Safety and Environment Manager (QHS&E Manager).

A short introductory meeting was held with Neil Young (QHS&E Manager) and Tom Brown (Production Manager), the findings of the previous site visit (CAR Reference NRW0040759) were also discussed.

The salient points following the site visit are as follows:

- The frequency of lead coating is expected to reduce going forward as demand for lead coating has fallen; however there are no current plans to decommission the process.
- The former boiler house stack is to be dismantled and the existing associated boiler house infrastructure removed. There are no confirmed proposals for the boiler house building itself.
- A group led initiative has commenced to improve the energy efficiency of the operations at the site.

Observations and Actions

1. Swarf Management

Observation - Metal cutting fluid was observed running from the swarf skip into the dedicated bund. Whilst this is not of particular significance in itself, there is a potential for contamination entering the on-site surface water and the drainage system when the skip is removed from the bund. The Operator advised that there is a procedure in place for the cleaning of swarf to prevent contamination, however on this occasion observations suggest that this had not been undertaken. **This is in breach of Condition 1.1 and has been scored C3.**

Action - The current procedures for the management of swarf are to be reviewed and updated where necessary. The operator is to ensure that staff are aware and understand the procedure and they are adhered to. **A copy of the procedure and evidence of dissemination to relevant staff is to be provided to NRW for review**

by 30 June 2023.

2. Oil and Waste Oil Storage

Observation - There is evidence of oil leaks spills and staining in and around the oil storage and waste oil storage bunds. The integrity and suitability of the bund appear inadequate. The Operator was unable to confirm the procedures for management of the bulk oil store, nor if the tanks had appropriate secondary containment. There is potential for hydrocarbons to be released into the environment via the soft landscaping behind the oil bund. **This is in breach of Condition 3.2.3 and has been scored C3**

Action - Procedures associated with the management and storage of oil / waste oil must be reviewed and where necessary updated and /or operatives trained appropriately in the correct procedures for handling oils. The integrity and suitability of the bund and ancillary equipment must be investigated and where necessary improved to prevent uncontrolled releases. *Guidance for containment systems to prevent pollution; Secondary, tertiary and other measures for industrial and commercial premises* is provided in CIRA C736. **A copy of the procedure and a programme for implementation for improvements is to be provided to NRW for review by 30 June 2023.**

3. Oil Water Interceptor and Associate Drainage

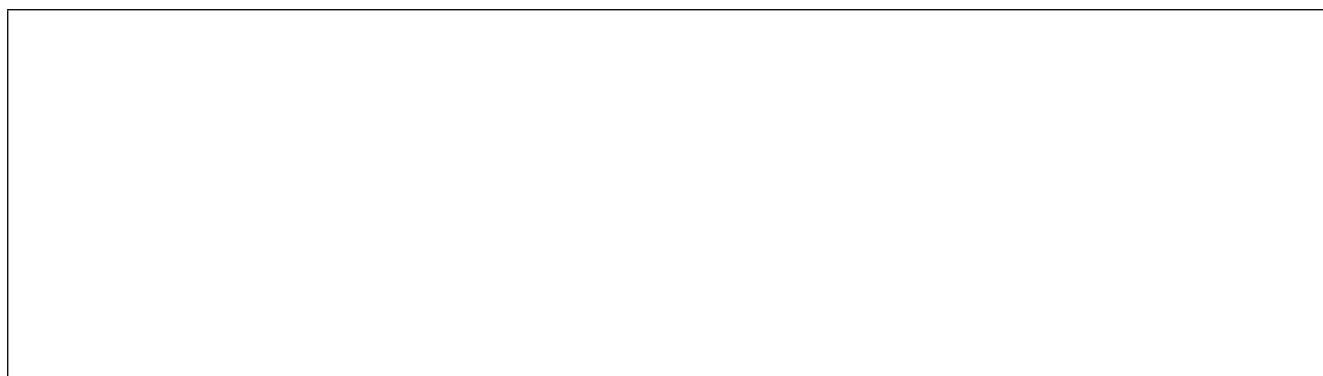
Observation - The drains around the bulk storage area were observed to be silted up and poorly maintained; the drains in their current state would be ineffective in the event of an unintentional release of oil; this may result in contamination entering the site surface water drainage system which discharges to controlled waters. **This is in breach of Condition 3.2.1 and has been scored C3.** The Operator was unable to confirm the procedure(s) for the maintenance and management of the drains and interceptor at the time of the inspection.

Action - Procedures associated with the inspection and maintenance of the drains and interceptors in the vicinity of the bulk oil store must be reviewed and where necessary updated and /or operatives trained appropriately in the correct procedures. **A copy of the procedure(s) is to be provided to NRW for review by 30 June 2023.**

Action - Drains to be cleaned and the integrity of the connection to the interceptor confirmed. **Evidence to be provided to NRW for review by 30 June 2023.**

4. Site Drainage Plan

Action - There was uncertainty regarding the on-site drainage arrangements. This Operator is to provide a copy of the site drainage plan to NRW by **30 June 2023.**



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.