

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	01/03/2019	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Groundwater and Surface Water Monitoring, February 2019				
Lead officer's name	Green, Rebecca				
Accompanied by					
Recipient's name/position	Martyn Grant/ Environmental Manager	Date issued	08/03/2019		

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	
C2 - General Management - Management system and operating procedures	A	
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	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
------------------------------------	----------	---	----------

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

The Groundwater and Surface Water Monitoring Report for February 2019 was received on 1st March 2019.

The report is accepted.

Surface Water Monitoring Results

In April 2018 Natural Resources Wales (NRW) agreed that the frequency of surface water monitoring could be reduced to six monthly (see CAR_NRW0033153).

Zinc (Zn) concentrations have increased at all sampling points except R7a, including C1 and R1 upstream of the site. The concentration was above the Environmental Quality Standard (EQS) at sampling points R7, R7a and C1.

Copper (Cu) concentrations were less than or equal to those in the previous round of monitoring, but remained above the EQS at sampling points R7, R7a and C1.

pH decreased by 0.1 units at sampling point R7 and increased by 0.2 units at C1. pH at the other sampling points was the same as in August 2018. All readings were within the EQS.

Other metal concentrations were the same or less than in the previous monitoring round and were less than their respective EQSs.

The Mann-Kendall statistical test indicates that Zn is probably increasing at sampling point R6 and that TPH is increasing at R7 and probably increasing at sampling point R7a. Other determinands show either no trend, stability or decreases.

The elevated metal concentrations found at sampling points R1 and C1 upstream of the site infer that there are other external sources contributing to the metal concentrations found in the Nant Mychydd.

Groundwater Monitoring Results

Metal concentrations in many of the boreholes (BH) remain above their respective EQS values. However, the concentrations in some are amongst the lowest recorded and the Mann-Kendall statistical analysis shows either no trend, probably decreasing or a decreasing trend in concentrations in all BHs, which is very encouraging.

The pH values in BH8 (4.5) and BH9 (5.0) remain a matter for concern as they are so low and do not show any signs of increasing. These consistently low pH values have not been accompanied by increasing metal concentrations, inferring that the ground contamination levels are either stable or reducing. A pH below 5.5 would increase the likelihood of metals in the surrounding soil dissolving and moving into the groundwater. The Royal Mint (RM) have completed the bund integrity survey of Building 9A and found all the bunds to be in good condition. It seems likely, therefore, that the source of contamination is elsewhere. NRW and RM agree that BHs north of BHs8 and 9 should be tested in the next round of monitoring to try to identify the source. BHs16, 701 and 19 were discussed as possible testing points, but the final decision will be made by RM.

The possibility of reducing the frequency of groundwater monitoring from every four months to every six months has been discussed before, but NRW did not feel that there was sufficient evidence to support the proposal.

Considering the results presented in this report and those of the Mann-Kendall statistical analysis, NRW can now agree to six monthly testing of both surface water and groundwater. The monitoring will actually be carried out three times a year, once as part of the Site Protection and Monitoring Plan and twice for the surface water and groundwater monitoring report.

This reduction in monitoring frequency is subject to the condition that the metal concentrations do not show any sharp spikes and that the results of the statistical analysis do not change significantly. RM should also add some BHs to the monitoring plan to try to identify the source of the low pHs in BHs8 and 9.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034780**

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	Date	01/03/2019

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.