

Compliance Assessment Report CAR_NRW0044442

Permit being assessed: BP3532HX.

For: Newport Ceramic Works EPR/BP3532HX, **held by:** Kennametal UK Ltd

At: Leeway Industrial Estate Lake Road , Newport, South Wales, NP19 4SR.

Type of assessment: Site Inspection,

Reason: Routine.

On: 23/05/2024 between 13:00 and 14:30.

Parts of permit assessed: Site update and inspection.

NRW Lead Officer: Rebecca Green.

Report sent to: James Wham, Manager EHS Plant, on 24/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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.

At this time, we do not intend to take any further action.

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

The purpose of this inspection was to update Natural Resources Wales (NRW) on Kennametal's present activities and proposed future developments prior to Rebecca Green's retirement.

Present at the meeting -

MW, Operations Manager, Kennametal;

JW, EHS Plant Manager, Kennametal;

Rebecca Green, Site Officer, Industry Regulation SE, NRW.

Future Regulation of the Site

RVG explained future arrangements for regulation of the site. Kennametal's compliance record has improved and so, in NRW's opinion, the site's operations pose less risk to the environment.

Consequently Kennametal will not, at present, have a designated site officer. They have received an email detailing future arrangements and should continue to send all monitoring data to Liz Parr.

Business Update

Titanium boride (TiB₂) is now bought in from Kennametal's Chinese factory and so the TiB₂ furnaces are not in use at present. Kennametal have retained some stock of raw materials in case there is a problem with the supply chain. Boron nitride (BN) is still manufactured on site.

Volumes are steady, although the product mix is changing.

Air Emissions

Particulate emissions from emission point A6 have reduced significantly since the installation of the new scrubber and new drying ovens and are now compliant with the emission limit value (ELV).

The scrubber and ovens are all on the Preventative Maintenance Programme. NRW appreciate the considerable investment in time and money that Kennametal have made in order to ensure particulate emissions from A6 are compliant with the ELV.

There continue to be intermittent problems with ammonia emissions from emission point A1. These seem to occur mainly in the winter quarter. The exact reason is not known, but the most recent exceedance was thought to be due to a reduced flow rate, instigated to optimise energy efficiency.

Flow rates have now been increased. The propane lances on the chimneys that sit on top of the furnace pots have been repositioned so that less BN is deposited on them, which should reduce the likelihood of them blowing out. Kennametal propose investigating whether fewer holes in the lances will also reduce the likelihood of them blowing out.

Emissions to Sewer

Kennametal do not have any limits in their permit for emissions to sewer, but they do have a Consent Limit issued by Welsh Water (DCWW). DCWW are concerned about boron levels in this discharge and are reviewing the consent limits. Some parameters will probably be removed and others added.

Energy and Resource Efficiency

Energy efficiency and resource use are under constant review.

Energy efficient motors have been installed on furnaces that are abated by emission point A1, resulting in considerable savings in electricity costs.

Power units (VIPs) on furnaces are being replaced with more efficient versions.

Solid cone plastic IBCs have replaced the flexible ones used for moving powder to the mill. This has reduced fugitive emissions of dust and thus wasted material.

Site Inspection

The site was not manufacturing so it was a good opportunity to inspect the furnaces and lances. Some pressing operations were running. All areas were clean and tidy. The flooring has been replaced with non-slip tiles.

NRW appreciate the investment that Kennametal have made in this site and it is now a much cleaner working environment. The open and co-operative relationship that has been developed with Kennametal is appreciated and NRW hope that this will continue into the future.

END.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.