

## Compliance Assessment Report CAR\_NRW0044448

**Permit being assessed:** BX9846ID.

**For:** Waunarlwydd EPR/BX9846ID, **held by:** Timet UK Ltd

**At:** Timet UK Ltd Timet Waunarlwydd , Waunarlwydd, SWANSEA, West Glamorgan, SA5 4SF.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 16/05/2024 between 09:45 and 14:30.

**Parts of permit assessed:** Routine Site Visit.

**NRW Lead Officer:** Daniel Packer, accompanied by Kirsty Thomas.

**Report sent to:** Scott Davies, HSE & Facilities Leader, on 13/06/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR2C - Installations - Operations - Operating techniques	C3 Minor	2.5 Waste Storage and Handling

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3B	Operator to review storage procedure and provide training and guidance if required for the safe storage of lubricants and provide spill kits where necessary. Provide an up to date spill kit plan	30/06/2024
IR2C	Operator to review waste storage procedure and provide training and guidance if required for the safe storage of	30/06/2024

Criteria	Action needed	Complete by
	<p>Hydrofluoric acid waste.</p> <p>Operator to Rreview waste storage procedure and provide training and guidance if required for the safe storage of waste oils and coolants.</p> <p>Provide an up to date spill kit site plan off.</p>	

Compliance 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.

**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

#### Attendees

- HSE & Facilities Leader, Timet
- UK H&S Manager, Timet
- Plant Director, Timet
- Electrical Manager, Timet
- Senior Officer, Industry Regulations Team, NRW
- Lead Specialist, Industry Regulations Team, NRW

#### Introduction

This Compliance Assessment Report was completed following a site visit on 16 May 2024. The aim of the visit was site and process familiarisation and introduction for the new regulatory senior officer for the site.

#### Site Operations

The Operator provided a tour of the site and overview of the current operations and production processes:

- Raw materials storage area
- Electric reheat furnaces
- Rod rolling & Sheet rolling
- Intermediate product descaling

- Pickling lines
- Acid delivery yard
- External scrubbers and stacks
- Service area courtyard
- Sample storage yard
- Swarf storage
- Waste oil and coolant storage
- Waste compound
- Effluent treatment plant
- Filter cake separator
- Lagoon and sprinkler system storage tanks

During the site walkover, process management and reporting stations used for recording Health, Safety and Environmental incidents were shown, and the site central Communication Hub, where these daily management activities are tracked, along with longer term progress of CAPEX for projects including environmental improvements.

#### Waste storage areas

Bunded waste storage areas were also visited, notably for storing titanium fines and filter papers and filter cake from Effluent Treatment Plant. At the time of the visit, housekeeping was good throughout.



*Waste storage area*

#### Effluent Treatment Plant

The Effluent treatment plant was visited where contaminated waste water is treated before being discharged. Appropriate containment in each area was seen comprising of bunding and secondary containment.



*Kalic stage tank*



*Effluent treatment plant stage 1 (left) Effluent treatment plant stage 2 (right)*



*Filter cake separator*

Storage areas for swarf and waste oils and coolants

The newly built covered swarf storage area was visited, at the time of the visit, housekeeping was good throughout.

A bunded covered storage area for waste oils and coolants had also recently been completed. At the time of inspection there was no spill kits located in the storage area and the sump was enclosed by waste oils and coolants containers limiting access. Several intermediate bulk containers (IBC) were also stored in close proximity to the entrance door. If pierced the contents inside may spout and bypass the bunded area.

This represents a non-compliance against permit condition 2.5 Waste Storage and Handling.

A consolidated category 3 (C3) non-compliance score has been applied under criteria (IR2C) Operating techniques.

**ACTION** - Operator to review waste storage procedure and provide training and guidance if required for the safe storage of waste oils and coolants.



*Storage area for waste oils and coolants*



*Sump area shown above with limited accessibility.*

### Construction works

At the time of inspection there was a new building being constructed for a new milling machine and saw and a new large car park to the rear of the property.



*Construction works for new building and car park*

### Metal sample storage

Solid metal samples are being stored to the rear of the building next to the test laboratory. A large bunded barrel of lubricant is also being stored here with no spill kit.

**ACTION** - Review storage procedure and provide training and guidance if required for the safe storage of lubricants and provide spill kits where necessary.



*Bunded barrel of lubricant*

The small boiler (previously identified to be rated < 1MWth and outside the MCP scope) used for surface treatment vats located next to the scrubber units was not operational at the time of inspection. Temporary heating equipment and diesel storage bowser is being used and stored on the pavement adjacent to the external front elevation of the building. Once the existing equipment is operational again this equipment should be added to the permit as a Directly Associated Activity during the next permit variation or review.



*Temporary heating equipment and diesel storage bowser*

#### External bulk delivery area for acids

The external bulk delivery area for acids used in surface treatment was inspected. Timet UK Ltd have submitted a response to CAR NRW0041934 outlining what attenuation and containment infrastructure is in place to minimise the extent of spills during unloading operations. This includes the requirement of drain covers be placed on blue storm drains in the acid delivery compound whilst product is being loaded/unloaded. The drain is in the process of being repaired and relined and both chemical processing lines no longer use the drainage as a means of transporting chemicals to the effluent plant or Licensed Waste Disposal Facility. Acid Tanks are emptied by Qualitech Environmental Services via tanker and transported the chemicals directly to the effluent plant for processing. This process is covered under Qualitech Risk Assessment Method Statement (RAMS) Appendix 4 and TIMET UK Ltd Permit to work. Further development work has been scheduled including bunding in the loading area to ensure it is 110% of the capacity of the truck volume and installation of a site interceptor for the drain to enable secondary containment in the event of loss of load not contained by bund.

At the time of inspection there was a Hydrofluoric acid waste bin stored next to an uncovered surface water drain.

This represents a non-compliance against permit condition 2.5 Waste Storage and Handling.

A consolidated category 3 (C3) non-compliance score has been applied under criteria (IR2C) Operating techniques.

**ACTION** - Operator to review waste storage procedure and provide training and guidance if required for the safe storage of Hydrofluoric acid waste.



*Hydrofluoric acid waste storage bin*

#### Scrubber unit area

At the time of inspection, a small leak was observed possibly from a liquid tank located next to the 2x scrubber units.

**ACTION** - Operator to confirm what the leaking liquid is and if the source has been found and isolated.



*2x Scrubber units shown on left and leaking liquid from tank shown on right*

#### IBC

Further on around the site in the service area courtyard, an Intermediate Bulk Container (IBC) was observed containing an oily liquid without secondary containment.

This represents a non-compliance against permit condition 2.5 Waste Storage and Handling.

A consolidated category 3 (C3) non-compliance score has been applied under criteria

(IR2C) Operating techniques.

**ACTION** - Operator to review storage procedure and provide training and guidance if required. Provide an up to date spill kit site plan off.



*IBC without secondary containment*

#### Lagoons and sprinkler system tanks

During the site walkover we also visited the lagoons located to the rear of the car park. These were previously used for fire extinguishing purposes. They are now not in use and new storage tanks have been installed for the sprinkler system.



*Lagoon shown on left and sprinkler tank system shown on right*

#### EPR Permit and BAT

During this and previous site visits and discussions of current operations, it was apparent that the operating techniques referenced in the permit are now out of date - several process bays and associated emission points have been removed from the permit Emission Limit Value and monitoring tables, but the primary operating techniques documents pre-date these variations.

As such, the operator may wish to apply to vary the permit operating techniques and also consider applying to consolidate the permit into a single, modern format permit, as the original and subsequent variations now comprise five separate parts, with multiple references to deletions and inclusions.

Best Available Techniques (BAT) aim to prevent or reduce emissions and impacts on the environment and industrial installations with specific types of activity must use BAT to prevent and reduced emissions to air, water and land. The new UK BAT process is working through industry sectors in tranches, the output of which is a Reference Note (BREF) and Conclusions document (BATc) which will inform permit reviews for operators in the sector.

It is likely that the relevant primary activity sector for Timet Waunarwydd will be Surface Treatment of Metals and Plastics (STM BREF) which is included in Tranche 2, expected to be developed from 2024 onwards. There may be an invitation to contribute to the data collection phase and if Timet is a member of a trade body, they may be invited to contribute to a coordinated sector response during the UK BAT process.

The upcoming BAT process presents a timely opportunity for the operator to review and update the site operating techniques, as this will also serve as a gap analysis exercise ahead of any contribution to STM BREF and BATc development and the subsequent permit review that will be initiated by NRW after publication of the BREF and BATc.

#### Compliance Summary

Non-compliance against permit condition 2.5 Waste Storage and Handling has been identified in the following areas(detailed above).

- Storage area for waste oils and coolants
- External bulk delivery area for acids
- Service area courtyard

A consolidated category 3 (C3) non-compliance score has been applied under criteria (IR2C) Operating techniques.

An Action only score has been applied against permit condition 2.2.5 Fugitive emissions of substances to water and sewer for the large bunded barrel of lubricant being stored in the solid metal sample area with no spill kit.

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](mailto: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](mailto: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.