

Compliance Assessment Report CAR_NRW0045436

Permit being assessed: BM3965IA.

For: Broughton Aircraft Factory EPR/BM3965IA, **held by:** Airbus UK

At: CHESTER ROAD BROUGHTON , CHESTER, CHESTER, CH4 0DR.

Type of assessment: Site Inspection,

Reason: Routine.

On: 16/10/2024 between 10:00 and 15:00.

Parts of permit assessed: See Section 4 (below).

NRW Lead Officer: Victoria Griffin, accompanied by Philip Harper.

Report sent to: Head of EHS BP (Broughton) , Head of EHS BP (Broughton) , on 01/11/2024.

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)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR1F - Installations - Management - Multiple operator installations	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

This was a prearranged visit of the Facility by Natural Resources Wales (NRW) regulating Officers.

Officers met with the Head of EHS BP (Broughton) and associated colleagues to discuss the current status of the facility with respect to the requirements of the permit and to discuss future plans and proposals. The salient points are summarised below.

Increased Capacity

Increased production capacity is required to meet the targets of "Rate ++", and as a result changes are being proposed. The former autoclave area (Hanger 91 & 92) will be utilised to partially accommodate the increased capacity.

The former A380 West Factory is to be retrofitted with a new manufacturing line, and the existing paint booths are to be updated to accommodate the changes. Proposals are also being considered which may result in the existing permitted emission stacks (A58, A59 & A60) being moved from their current position. The implications of this from a permit variation perspective were discussed, as was the current NRW permitting determination queue.

Dispersed Combustion Plant

Previously the Operator had confirmed that many of the combined heat and power (CHP) boilers were coming to the end of their operational life. The CHP plant in the A380 West Factory had been highlighted as a priority. Consideration is now being given to replacing the CHP plant in this location with air source heating. This strategy is also being considered for the wider facility.

Aluminium Swarf

Aluminium swarf from the high speed milling lines is now being compressed and formed into aluminium "pucks". The pucks are currently still recorded as a waste (12 01 03 non-ferrous metal filings and turnings) but a means of declaring as an End of Waste is being sought.

Hexavalent Chromium

The Government authorisation for use of hexavalent chromium compounds (UK REACH Annex 14) will remain in place until a test period for the application of chromate-free

primers on a fleet of aircraft ends in 2029. The chromate-free primer has an increased VOC content and investigations are underway to provide mitigation for this.

Currently a suitable alternative for the chromate “pen” (Alodine 1132), used for small scale touch ups, has yet to be sourced.

The Operator also confirmed that Government authorisations have also be been granted for the use of cadmium compounds and some sealants at the facility.

General

Axil Integrated Services have been contracted by CBRE (facilities management) to undertake the waste management at the Facility.

Contrary to initial understandings, Bocard, a separate entity operating independently within the permitted Facility boundary, do not undertake any activities regulated by the Environmental Permitting Regulations (EPR) and therefore do not require an EPR permit.

Following the meeting, a brief high-level tour and re-familiarisation of key parts of the facility was undertaken. The site was well managed, ordered and tidy at the time of the visit.

An Operator Monitoring Assessment (OMA) audit for air emissions is scheduled for early December 2024.

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.