Compliance Assessment Report CAR_NRW0046285

Permit being assessed: JP3632ZH.

For: Barry CHP , **held by:** Dow Silicones UK Limited

At: Wimborne Road - Dock 2, Barry, Vale of Glamorgan, CF63 3DH.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 3.2.1.

NRW Lead Officer: Geraint Harris.

Report sent to: Environmental Manager, Environmental Manager, on 18/03/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	Action only (X)	
IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	Action only (X)	
IR2C - Installations - Operations - Operating techniques	C4 No impact	2.3.2
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3
IR4C - Installations - Information - Notification	Action only (X)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR1A - Installations - Management - General Management	Ongoing (O)	1.1.1
IR1A - Installations - Management - General	Ongoing (O)	1.1.1

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
Management		
IR1A - Installations - Management - General Management	Ongoing (O)	1.1.1.
IR1A - Installations - Management - General Management	Ongoing (O)	1.1.1
IR1A - Installations - Management - General Management	Ongoing (O)	1.1.1
IR1A - Installations - Management - General Management	Ongoing (O)	1.1.1.
IR4B - Installations - Information - Reporting	Action only (X)	
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3 (b)
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3 (b)
IR2E - Installations - Operations - Improvement programme	C3 Minor	2.4.1
IR2E - Installations - Operations - Improvement programme	Ongoing (O)	2.4.1
IR2E - Installations - Operations - Improvement programme	Ongoing (O)	2.4.1

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

Total non-compliances recorded	Total non-compliance score
7	12.4

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
IR3H	Please provide NRW with a copy of the QAL 2's for the new CEMs by the 20th of March 2025.	30/04/2025
IR3H	Please confirm that Dow is checking the validity of their valid calibration ranges on weekly as required by 14181?	30/04/2025
IR2C	Make sure Dow operate in accordance with the requirements of the permit and JEP Protocol	30/04/2025
IR4B	Ensure any future reports reflect the requirements of the permit.	30/04/2025
IR4C	Since the Schedule 5 Notice and the monitoring returns don't completely match, Dow must review their data and resubmit both forms with the correct data.	30/04/2025
IR3A(2)	Implement the changes described in part B of your schedule 5 notice.	Already completed
IR3A(2)	Implement the changes described in part B of your schedule	Already

Criteria	Action needed	Complete by
	5 notice.	completed
IR1A	Does Dow have any evidence to show that when developing operating/MOC documents manufacturer's instructions should be considered and implemented?	30/04/2025
IR1A	Please explain why the manufacturer's recommendations were not implemented in the management of change procedures for the replacement and calibration of the O2 analysers.	30/04/2025
IR1A	Are there procedures/instructions for controlling the O2 trim and CO emissions?	30/04/2025
IR1A	The fact that the nightshift missed the O2 trim settings and co emissions suggests either a lack of training or competence. Please investigate what the root cause was for the nightshift not identifying that the O2 trim was zero and report your findings to NRW. Was it a lack of training?	30/04/2025
IR1A	With regards to the information displayed on the DCS control screens, what more could be done to ensure such a scenario doesn't occur again?	30/04/2025
IR1A	The blocking of inlet fans with debris is a reasonably foreseeable situation. NRW would like to know why this hasn't been considered in previous management system and operational reviews.	30/04/2025
IR4B	Please provide NRW with the MP operating hours for 2024.	30/04/2025
IR4B	Please submit the 6 monthly reporting forms for dust and SO2 for emission points A1, A2 and A3, for the first and second half of 2024.	Already completed
IR4B	Please investigate the root cause for your failed submissions and report your findings to NRW.	30/04/2025
IR2E	Please complete IC7 by reviewing your operating data to establish a more realistic set of reporting thresholds for the CHP plant. Due 28th March 2025	30/06/2025
IR2E	Can Dow operate stable steam and/or electricity supply to the site while operating under their current reporting threshold? Due 28th March 2025.	30/06/2025
IR2E	If the answer to action 21 is yes. Then please report to NRW, how many hours you stably generated steam and/or electricity while operating under the current reporting thresholds in 2024. Due 28th March 2025	30/06/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Dow CHP

EPR JP3632ZH

CEM's Analysers

NOx Converters

The installation of the new CEM analysers on all three emission points (A1, A2 and A3) has now been completed. It was not clear whether these CEMs were equipped with a NOx converter, so Action 1 (below) from compliance report CAR_NRW0045374 was issued to Dow.

Action 1: Do the new CEMs utilise a NOx Converter? If not, are NO and NO2 measured separately? Due 6TH November 2024.

Dow replied stating that there is a NOx converter on the new analysers - P/N SCC-K as per MCERTS. The SCC-K NO2/NO converter converts the NO_2 content of the sample gas by catalysis into NO. To do this the sample gas is conducted through a special stainless steel cartridge with a catalyst-filling based on carbon-molybdenum. This conversion makes it possible to measure nitrogen oxides indirectly using all commercially available NO-selective measurement instruments.

Please remember that if the sampling system is equipped with a NOx converter, then the operator needs to ensure that the efficiency of this converter is tested at least once per year, more frequently if the manufacturer of the converter specifies more frequent checks, and the efficiency must not be less than 95%. This is also reflected in the converter operating manual which states "If the degree of efficiency falls notably below 95 %, the used catalyst cartridge should be replaced". The test for converter efficiency should meet the requirements of EN 14792.

Action 2: Please provide the details on the type of ABB CEMs that have been installed at Dow CHP. Due 6TH November 2024.

Dow replied stating that the three new analysers are ABB Easyline EL3020. These are MCERT's certified analysers.

QAL 2's

It is recommended in technical guidance note M20 that at least 3 months of QAL3 data is required to demonstrate that a CEM is stable before the QAL2 and AST exercises can be commenced. The QAL 2 exercises should have been completed by now.

New Action 1: Please provide NRW with a copy of the QAL 2's for the new CEMs by the 30th of April 2025.

Permit condition 3.5.1 requires Dow to undertake the monitoring specified in Schedule 3 of their permit. Included within Schedule 3 is the requirement to comply with BS EN14181, which requires operators to

undertake the following:

The validity of the valid calibration range shall be evaluated by the plant owner on a weekly basis (Monday to Sunday). A full new calibration (QAL2) shall be performed, reported and implemented within 6 months, if any of the following conditions occur:

1. *more than 5 % of the number of AMS measured values calculated over this weekly period (based on standardized calibrated values) are outside the valid calibration range for more than 5 weeks in the period between two AST;*
2. *more than 40 % of the number of AMS measured values calculated over this weekly period (based on standardized calibrated values) are outside the valid calibration range for one or more weeks.*

New Action 2: Please confirm that Dow is checking the validity of their valid calibration ranges on weekly as required by 14181? Due 30th April 2025.

Monitoring Returns

Q3

Forced draft mode: In July, Dow CHP experienced a few issues with the A1 GT. On the 27th, 28th, 29thand 30th operations were up and down and ran above the reporting threshold in FD mode for 4 hours of the day, therefore, these days currently don't qualify for reporting. The only day where they were over the current reporting threshold and the 6 hour minimum reporting threshold was 31st July. The max daily mean for that day was 93.8mg/m^3. The August max daily mean, which was over the limit data point, was the 1st August. The GT was started up that day, but the unit was not above the reporting threshold for the remainder of the day. For reference, an LCP daily (24h) average is calculated for all calendar days as the arithmetic mean of the LCP validated hourly averages. At least 6 hours of validated data is required to form a daily average for reporting purposes. The current reporting thresholds for start-up and shutdown are in Table S1.4 of their permit. If the CHP plant is capable of operating stably and able to export steam/electricity to the site below the current reporting thresholds then this suggests that they might not be adequate thresholds. Therefore, a review of Dow's operating practices and current thresholds is required. Please see the section titled Start-up and Shut-down Thresholds for more information and actions.

The results for emission point A1, while operated in turbine exhaust mode (TEG), are well within the emission limits in Schedule 3(b) Table S3.1(a) of the permit. The emissions while operating in forced draft (FD) mode are within the original boiler limits. Now that Dow's GTs are operational, the use of FD mode is being minimised. On 7th August the new analyser was installed and showed that the previous analyser had been reading dramatically elevated NOx levels. Where the unit used to run around 80 mg/m^3 in FD mode and 60mg/m^3 in TEG fired – it was now running at 40 mg/m^3 in FD mode and 15 mg/m^3 in TEG fired mode. This is evident in Dow's returns, with both the FD and TEG modes below the BAT ELVs listed in Table S3.1 in their permit. The results for emission point A3 were all reported as being well within the BAT ELVs listed in Table S3.1 of Dow's permit.

Permit condition 2.3.2 states: "For the following activities referenced in schedule 1, table S1.1: LCP60. Without prejudice to condition 2.3.1, the activities shall be operated in accordance with the "Electricity Supply Industry IED Compliance Protocol for Utility Boilers and Gas Turbines" revision 1 dated December 2015 (as corrected

March 2017) or any later version unless otherwise agreed in writing by Natural Resources Wales."

The protocol above requires that at least 6 hours of validated data be required to form a daily average for reporting purposes. Following a query on CHP operational modes, Dow discovered that their old system was set up for 1 hour of valid data. This means they have been capturing data that shouldn't have been reported. When Dow reran the data on the new system, which was updated using the 6-hour criteria, they found their Q3 data looked different as the odd hours of data in July were no longer reportable.

Dow was previously requested, in compliance report CAR_NRW0041255, to make sure that what they report reflects the requirements of the Permit and JEP Protocol. Dow's DAHs system should reflect the requirements of both the permit and the Protocol so that any irrelevant data is omitted from their reports. Subsequently, they were issued with the following action; New Action 5: Dow must investigate if their current DAH system reflects the requirements of the permit and JEP Protocol. Due April 28th, 2023. It is evident that such a review didn't take place. Therefore, a category 4 **non-compliance score is being issued** against permit condition 2.3.2 for failure to operate in accordance with the Electricity Supply Industry IED Compliance Protocol for Utility Boilers and Gas Turbines.

N**ew Action 3: Make sure Dow operate in accordance with the requirements of the permit and JEP Protocol.**

Since Dow has been submitting daily emissions data based on 1-hour of valid data and not 6-hours, as required by the permit, a **noncompliance category 4** is being issued against permit condition 4.2.3 for failure to submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit.

New Action 4: Ensure any future reports reflect the requirements of the permit.

Q4

There were three carbon monoxide (CO) exceedances recorded in the Q4 monitoring returns. These were:

- A1 November 410.28 mg/m^3 – Max daily mean
- A1 December 201.43 mg/m^3 – Max Daily mean
- A3 November 243.9 mg/m^3 – Max Daily mean

There were four CO exceedances recorded in Dow's Schedule 5 Notice for the same period. These were:

- A1 5th November – 410.3 mg/m^3 – Monthly max daily mean
- A1 10th December – 132.9 mg/m^3 – Daily mean
- A1 19th December – 162.4 mg/m^3 – Daily mean
- A3 12th November – 243.9 mg/m^3 – Monthly max daily mean

New Action 5: Since the Schedule 5 Notice and the monitoring returns don't completely match, Dow must review their data and resubmit both forms with the correct data. Due 30th April 2025.

There seems to be several reasons for the breaches in CO limits during this quarter. Following on from Dow's planned shutdown period, the burner O_2 analysers were found to need calibration. New sensors were installed during the shutdown and calibrated "cold". The manufacturer advises that new sensors should be "hot" calibrated when they are brought online. Consequently, as a result of using the wrong calibration method, the oxygen settings were incorrect and so the CO levels increased beyond the permit limits. Accordingly, Dow carried out the correct calibration method, increased the O_2 trim and brought the emissions back within compliance. Dow states that the requirement for "hot" calibration will be added to the start-up

procedure for all three boiler units.

On the 18th of December, Unit A had been running in FD mode with an increased O_2 trim value to add additional air and reduce CO (this setting has been used since the recent shutdown). In the afternoon, the GT on Unit A was started up. Starting the GT automatically sets the O_2 trim value to zero. Later in the evening, the GT tripped, the unit continued to run in FD mode, but the O_2 trim value was not increased. The nightshift did not realise that the CO was high. The day shift came in, realised the CO was high and immediately increased the O_2 trim value. The CO value returned to very low levels, however, the daily mean was high as the unit did not run for the full rest of the day to bring the daily value back within range. Therefore, the daily CO emissions for the 19th of December exceeded the limit. Dow have proposed that additional stack O_2 and CO measurements are to be added to the process control screens to enable issues with burner O_2 analysers to be identified more easily. Dow's operational team are to be tasked with making improvements to the tuning and control of the unit to ensure that if the GT trips, sufficient O_2 is available to mitigate against the risk of high CO concentrations.

The exceedance on the emission point A1 on the 10th December was a result of a plastic bag restricting the airflow of the air input fan. Once the bag was removed the CO levels were brought back within limits. An additional guard to prevent debris from being able to enter the air fan inlet will be designed and installed on all three units to prevent this from happening again. Currently, a fence has been put in place as a temporary measure.

NRW applies one non-compliance for each emission limit value that is breached during a quarter, regardless of the reporting period. This allows NRW to treat each operator consistently. The 3 exceedances in carbon monoxide emissions from emission point A1 all occurred in the same reporting quarter (Q4). Therefore, these have been consolidated into a single non-compliance. The CO exceedance for A3 is a separate emission point and so cannot be consolidated, therefore, this is also a non-compliance. These exceedances occurred whilst the unit was in FD mode, therefore the mass flow rate of CO was at its lowest. These units usually run with very low CO, so the overall impact of these exceedances is likely to have been minimal. Therefore, it is unlikely that these emissions would have been significant enough to constitute a category 2 non-compliance. Since CO has permit limits and can cause minor impacts, category 3 non-compliance scores are deemed appropriate for such exceedances of CO emission limits. Therefore, **two category 3 non-compliance scores are being issued against permit condition 3.1.2 for exceedances in the CO emission limits.**

New Action 6/7: Dow to implement the changes highlighted in there Schedule 5 Notice as soon as possible.

Where we find noncompliance we must also investigate the root cause. We categorise a root cause non-compliance on its own merits i.e. it does not have to have the same category as the original breach. There are three obvious immediate causes for these non-compliances, however, it is imperative to investigate whether there are more fundamental management issues to consider. The failure to implement the manufacturer's recommendations when installing and calibrating new O_2 sensors suggests that the management of change procedures for the CHP plant was inadequate.

New Action 8: Does Dow have any evidence to show that when developing operating/MOC documents manufacturer's instructions should be considered and implemented? Due 30th April 2025.

New Action 9: Please explain why the manufacturer's recommendations were not implemented in the management of change procedures for the replacement and calibration of the O_2 sensors. Due 30th April 2025.

Dow highlighted that the nightshift did not realise that the CO was high during their shift. It was only when the day shift started that it was realised the CO was high and immediately increased the O_2 trim value. Dow's permit requires them to manage and operate their activities using sufficient competent persons and resources. Since controlling the O_2 trim is essential for controlling the CO emissions, this should form a fundamental part of the plant's operating procedures. Consequently, NRW would like to know the answers to the following questions:

New Action 10: Are there procedures/instructions for controlling the O_2 trim and CO emissions? Due 30th April 2025.

New Action 11: The fact that the nightshift missed the O_2 trim settings and co emissions suggests either a lack of training or competence. Please investigate what the root cause was for the nightshift not identifying that the O2 trim was zero and report your findings to NRW. Was it a lack of training? Due 30th April 2025.

New Action 12: With regards to the information displayed on the DCS control screens, what more could be done to ensure such a scenario doesn't occur again? Due 30th April 2025.

New Action 13: The blocking of inlet fans with debris is a reasonably foreseeable situation. NRW would like to know why this hasn't been considered in previous management system and operational reviews. Due 30th April 2025.

MP Boilers

Permit condition 2.3.5 states "for the following activities referenced in schedule 1, table S1.1: LCP60 MP boilers. The activities shall not operate for more than 1500 hours per year from the date agreed upon completion of improvement condition IC8."

New Action 14: Please provide NRW with the MP operating hours for 2024. Due 30th April 2025.

Missing information

Table 4.1 lists Dow reporting requirements. The sulphur dioxide and dust monitoring for emission points A1 to A5 must be reported every 6 months. In 2024, NRW received the following:

- Q1 2024, no dust or SO_2 returns for emission points A1 -A5
- Q2 2024, dust and SO_2 returns for A4 and A5 only
- Q3 2024, no dust or SO_2 returns for emission points A1 -A5
- Q4 2024, dust and SO_2 returns for A4 and A5 only

In accordance with permit condition 4.2.3, Dow is required to submit reports of their monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

a. in respect of the parameters and emission points specified in Schedule 4 Table S4.1;
b. for the reporting periods specified in Schedule 4 Table S4.1 and using the forms specified Schedule 4

Table S4.4; and

When comparing the above to the permit requirements, Dow failed to supply the 6-monthly dust and SO_2 returns for emission points A1-A3 in 2024. Therefore, **two category 4 non-compliances** have been issued against permit condition 4.2.3 for failure to submit the two required reports in 2024 on time. These were subsequently received on the 21st of February 2025.

New Action 16: Please investigate the root cause for your failed submissions and report your findings to NRW. Due 30th April 2025.

Permit condition 4.2.2. requires Dow to submit a report on the performance of their activities over the previous year to Natural Resources Wales by 31st January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

a. a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
b. the annual production / treatment data set out in Schedule 4 Table S4.2; and
c. the performance parameters set out in Schedule 4 Table S4.3 using the forms specified in table S4.4 of that schedule.

It has previously been agreed with Dow that submissions relating to permit condition 4.2.2. would be submitted by the 31st of March each year.

Dow hasn't completely satisfied permit condition 4.2.2. C since their LCP Net Rated Thermal Input Capacity (MW) data is absent from their reporting forms. However, updated reporting form were not issued to Dow by the regulator as required and so this is not considered a non-compliance.

Start-up and Shut-down Thresholds

Following the commissioning of dry low NOx (DLN) conversion of the CHP gas turbines and a period of operation for optimisation, Dow was required to submit a written post-commissioning report to Natural Resources Wales for approval as required by IC7. The report should contain the emission reductions achieved and relevant performance parameters under the full range of operating scenarios, including start-up, shutdown thresholds and effective DLN thresholds. NRW received the response to IC7 on the 9th of November 2021. The post-commissioning revised SU/SD and effective DLN thresholds were not properly established in the improvement program response and remain outstanding with the potential for under-reporting of reportable emissions. This now needs to be addressed with some urgency.

An action was issued in compliance report CAR_NRW0039130 for Dow to review the responses for two sections that weren't complete and for them to re-submit any missing information. Unfortunately, no resubmission was made and so therefore, Dow has not completed IC7. NRW deem that sufficient time has passed for DOW to have completed this improvement condition and so a **non-compliance against permit condition 2.4.1 is being issued.**

Dow are currently using the reporting thresholds in Table S1.4 of their permit. However, Article 5, of the Start-up and Shutdown Implementing Rules, says "If any aspects relating to the plant that affect start-up and shutdown periods change, including the installed equipment, fuel type, plant role in the

system and installed abatement techniques, the permit conditions related to start-up and shut-down periods shall be reconsidered and, if necessary, updated by the competent authority." These implementing rules define a Minimum Start-Up Load (MSUL), for stable generation, and a Minimum Shutdown Load (MSDL), for stable generation, below which the combustion unit cannot safely and reliably deliver its output to the grid or industrial site. These implementing rules are also adopted by the LCP BREF. This is the main reason for the request to complete improvement condition 7.

New Action 17: Please complete IC7 by reviewing your operating data to establish a more realistic set of reporting thresholds for the CHP plant. Due 30th June 2025.

New Action 18: Can Dow operate stable steam and/or electricity supply to the site while operating under their current reporting threshold? Due 28th June 2025.

New Action 19: If the answer to action 1 is yes. Then please report to NRW, how many hours you stably generated steam and/or electricity while operating under the current reporting thresholds in 2024. Due 30th June 2025

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.