

Compliance Assessment Report CAR_NRW0048849

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: 15/07/2025 between 09:20 and 12:00.

Parts of permit assessed: Routine site inspection.

NRW Lead Officer: Daniel Packer, accompanied by Michael Launder.

Report sent to: Oporum Okwu, UK HSE Manager, on 16/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	C3 Minor	Permit Condition 2.5 – Waste Storage and Handling
IR2C - Installations - Operations - Operating techniques	C3 Minor	Permit Condition 2.5 – Waste Storage and Handling
IR2C - Installations - Operations - Operating techniques	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR2C	Ensure waste products are stored within the designated bunded area.	31/08/2025

Criteria	Action needed	Complete by
IR2C	Ensure IBCs stored within the designated bunded area and provide a spill kit for area.	31/08/2025
IR2C	Remove redundant Hydrofluoric Acid bin labeling or remove from area if no longer required.	31/08/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

EPR Compliance Assessment Report (CAR)

Operator: TIMET UK

Location: Waunarlwydd Site

Date of Visit: 15/07/2025

NRW Officers Present:

- Senior Industry Regulation Officer – South West Wales
- Lead Specialist – Industry Regulation – South West Wales

Operator Representatives Present:

- HSE Manager – TIMET UK
- Project Engineer – TIMET UK
- Manufacturing Manager – TIMET UK
- Facility Manager – TIMET UK

1. Site Overview & General Observations

- The operator provided a comprehensive tour of the facility including key production areas, storage, and waste management areas.
- Good standards of housekeeping were observed throughout the main process buildings.

- Walkway/gangway segregation is clearly marked in all internal areas to support health and safety compliance.
- A new Safety Manager is due to start shortly. NRW requested the operator to initiate contact to arrange a formal introduction.

2. Environmental Management Systems

- Each designated site area utilises a daily updated **Cubic Review Board**, split into four themes: Quality, People, Delivery, and Safety. Data from these boards is centralised and displayed in a prominent **Information Hub** used by all staff.
- This practice promotes awareness and continuous improvement and supports elements of ISO14001.

3. Waste Storage & Handling – Non-Compliance Identified

3.1 Sludge Storage Area

Operated stated they are in the process of changing from an American to an Eastern European waste processor to remove material from site which has resulted in an excess of material on site.

- The bunded sludge storage area was found to be at maximum capacity, with wet titanium sponge barrels stored outside the bund.
- This constitutes a breach of EPR Permit Condition 2.5 – Waste Storage and Handling.
- A **Category 3 (C3) non-compliance** has been recorded under criteria **IR2C – Operating Techniques**.

3.2 IBC Storage Area

- IBCs were observed stored beyond the capacity of the bunded area, with some units protruding from the containment.
- Additionally, no spill kit was available nearby. However, it is worth noting that there was generally good coverage of incident response kits internally and the newer constructed buildings externally.
- The lack of spill kit near the IBC Storage Area breaches Permit Condition 2.5 – Waste Storage and Handling, resulting in a second **C3 non-compliance (IR2C)**.

4. Process Areas Observed

4.1 Jet Cutter

- Operating at approx. 60,000 PSI with a closed-loop water tank system cleaned annually.

4.2 Rolling Operations

- Realer area includes a convex/concave roller setup to straighten heated titanium products.

4.3 Pickling Lines

- Two systems observed: Semi-automatic and automatic, using hydrofluoric acid, capable of removing up to 2 microns of material.

4.4 Swarf & Effluent Management

- Swarf storage area bunded with a sump draining to the Effluent Treatment Plant (ETP).
- The ETP area includes a newly installed dual-walled overspill tank to prevent overload events.

4.5 Kalic Tank

- Evidence of white staining on the external surface of the tank. Operator confirmed recent overflow incident, contained within the bund.
- Operator stated this was due to human error. A digital level gauge will be installed to prevent recurrence.

4.6 Acid Delivery Area

- Operator confirmed piping from acid delivery area to ETP has been inspected and newly lined within the last year by contactors.
- Operator plans to install an interceptor during the next shutdown.
- A Hydrofluoric acid waste bin was found adjacent to an uncovered surface water drain. Operator confirmed the bin is no longer used for hazardous waste but will remove outdated labelling to prevent misidentification.
- Operator advised to install splash guards near adjacent pedestrian walkway.
- Operator is currently in the design process of building a sump and spill mitigation for the acid delivery area. Operator will forward design proposal to NRW for discussion.

5. Infrastructure & Investment

- A newly constructed saw mill building was visited. The area is bunded with ACO drains linked to the ETP and fitted with spill kits.
- The ETP area has a newly installed dual-walled overspill tank to prevent overload events.

- The stores building has been fitted with new racking systems and sprinklers on each tier.
- Operator currently stores product test samples externally but intends to build a covered facility. Operator stated test samples must be stored for up to 50 years. Note – current storage of samples in metal barrels has poor and missing labelling and damaged barrels. Operator to improve sample storage and identification.
- Operator stated they have invested of \$4.1 million in the fire hydrant ring main system over the last year across the site.

6. Permit Modernisation & BAT Alignment

- The operator confirmed they are awaiting publication of the updated **Surface Treatment of Metals BREF (STM BREF)** before seeking to modernise the permit.
- Several areas of the permit, including process bays and emission point references, are now outdated due to operational changes.

The upcoming **UK BAT review (Tranche 2)** presents an opportunity to align permit conditions and participate in sector-wide data collection. If a member of a trade association, the operator may be invited to contribute to the development of **BAT conclusions (BATc)**.

7. Wildlife Management

- Operator is addressing gull presence on site using a contractor with a Harris Hawk.

8. Diesel Storage Area

- Dual-lined diesel tank inspected. Area is bunded and equipped with a spill kit and emergency response equipment – compliant.

9. Recycled Waste Area

- Managed by FWM Waste Management. Systems observed were compliant with permit expectations.

Summary of Compliance Status

Area	Observation	Compliance Status	Action Required
Sludge	Wet titanium sponge	Non-Compliant	Remove stockpile or store within bund.

Storage	stored outside bund	(C3)	Confirm contractor arrangements.
IBC Storage	Overcapacity; no spill kit	Non-Compliant (C3)	Remove excess IBCs, install spill kit.
Hydrofluoric Acid Bin	Mislabelled container near drain	Advisory	Remove outdated label

Actions Required by Operator:

1. Submit evidence of corrective actions for non-compliances listed above.
2. Initiate formal contact with NRW regarding the new Safety Manager.
3. Forward design plans for Acid Delivery area bund installation.

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.