

This form will report compliance with your permit as determined by an NRW officer

Site	Milford Haven Refinery	Permit Ref	AP3830XQ	
Operator/Permit holder	Puma Energy Uk Ltd			
Regime	Installations			
Date of assessment	12/09/2019	Time in	10:00	Out 13:00
Assessment type	Audit			
Parts of the permit assessed	See below			
Lead officer's name	Dunn, Karen			
Accompanied by				
Recipient's name/position	Edmund Whitmore / Uk Environmental Engineer	Date issued	03/10/2019	

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
E3 - Emissions - Surface water	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Operator representatives throughout the handover visit were:

Richard Livock – UK Environmental Engineer

Edmund Whitmore – UK Environmental Engineer

The following person was also present during various areas of the visit and introductions between the site manager and the new NRW site inspector were made:

Kevin Rees – Terminal Manager

The following agenda items were provided prior to this handover:

- Introduction
- Overview of Management/Reporting Structure
- Site/Process Overview
- On-site inspection of key areas (discharge points/waste areas/jetty etc)
- AOB

Introductions

There have been staff changes in NRW following a re-organisation which took effect on 1 July 2019. The NRW Industry Regulation Team in SW Wales has had a site reallocation and as a result Karen Dunn (Karen.Dunn@CyfoethNaturiolCymru) is assigned to the regulation of the environmental permit for the Puma Energy Ltd Milford Haven Terminal. Gary Evans remains the COMAH inspector for the site as part of the Competent Authority(CA) with the HSE.

The operator has also experienced change with Richard Livock the UK Environment Engineer at the time of the visit leaving Puma Energy Ltd. Edmund Whitmore is now the UK Environment Engineer for Puma Energy Ltd (Puma) at the Milford Haven Terminal. The main purpose of this visit was to undertake a handover tour of the terminal for familiarisation purposes for the new NRW inspector. It also provided a good opportunity for all individuals to be part of the visit for continuation of operation and regulation going forward.

Overview of Management/Reporting Structure

Kevin Rees provided a high-level overview of current operations and management structure at the terminal and within Puma Energy UK. It was discussed that the UK Environmental Engineer will cover several sites across the UK, however as the Milford Haven terminal is the largest most complex in the group, it is anticipated that a large proportion of time will be spent here.

The installation at Milford Haven is currently up for sale however Puma Energy Ltd are continuing to operate the facility as an active terminal.

Site/Process Overview

In brief the Milford Haven Terminal is operated by Puma Energy Ltd to import and distribute white oils, it has also been utilised for the storage of crude oil for customers. Currently the operator is in the process of cleaning out the crude oil storage tanks as the majority has recently been exported. Puma are regulated under EPR for the storage and handling of crude oil and will continue to remain as a permitted activity for future flexibility to enable crude imports as and when required.

The operator has reduced the quantity of gasoline at the facility and distillates are the main product on site. Similarly, most of the material transported to the inland terminals in England are predominantly distillate. Gasoline is however distributed locally via road tanker wagon from the terminal.

On site inspection

An overview of the terminal was undertaken with the main outcome being the inspection of the surface water release points from the facility. This included the main discharge point (W1) located at the jetty in Gelliswick. The inspection of the discharge points showed no visible contamination at the point of discharge.

The on-site effluent treatment plant (ETP) which was initially constructed and operated for the former oil refinery was visited. The system has significant capacity and without the refining activity it provides a large area with a sizable retention period for any effluent at the terminal. At the ETP a discussion was held on current ETP performance and how there have been no breaches in the emission limit values in the permit from any release points. The inspection of the surface water release points provided an opportunity to inspect the full site boundary including the waste storage areas and jetty.

Permit Review

The environmental permit for the site is currently under review following the publication of the Refineries BREF in 2015. Prior to the site visit discussions took place with the operator on the EPR Regulation 60 response submitted by the operator that demonstrates compliance with the surface water parameters against the new BREF levels. As the facility no longer operates as an active refinery, on review, the number of parameters required may differ and therefore NRW would request the operator submits a letter detailing the latest results on Fluoride and Cyanide for further consideration by NRW in respect of the reviewed permit.

Action: Operator to supply 6 months monitoring data on W1 for Cyanide and Fluoride.

[End]

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035775**

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.