

Compliance Assessment Report

**Report ID:
CAR_NRW0036421**

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

Site	Abercynon Inorganics EPR/BV7443IP		Permit Ref	BV7443IP	
Operator/Permit holder	AB Connectors Ltd				
Regime	Installations				
Date of assessment	28/02/2020	Time in	10:15	Out	11:15
Assessment type	Audit				
Parts of the permit assessed	Site Inspection				
Lead officer's name	Harris, Geraint				
Accompanied by	Griffiths, David				
Recipient's name/position	Ian Tollan/ Plating shop Superintendent	Date issued	04/03/2020		

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
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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

AB Connectors

Permit BV7443IP

Site visit and Handover with Iain Tollan (Plating Shop Manager) 28th February 2020.

The purpose of this visit was to hand regulation of the site under EPR from David Griffiths to Geraint Harris. Internally there has been an organisational restructure at NRW with the previous officer no longer regulating this facility. This meeting and inspection served as an introduction to the site and an overview of site operations, management and site layout. This physical inspection was limited to just a familiarisation and did not look in detail at the technical processes, goods and waste movements, physical infrastructure or drainage systems.

The internal and external areas of the site were inspected and found to be well organised. In the Waste Storage area at the rear of site, all the waste material was stored appropriately. Within the hardstanding area, all waste was stored correctly. The containers stored outside were all empty and waiting disposal / recycling. The raw materials were found to be well secured and stored appropriately. The onsite drains were painted according to their purpose.

The site utilises a new filter press and settling tank in the Waste Water Treatment area. The system was switched on during the site tour and found to be working appropriately. The blue filter cake was collected in a FIBC stored within a cut off IBC.

Monitoring and Reporting

Received and reviewed the following reports:

- Emission to Sewer (Form S1) - Q1,Q2,Q3,Q4 2019

All parameters were measured within the permitted limits.

- Emissions to Air (Form A1) - 2019

Emissions to air A4, Oxides of Nitrogen (asNO₂)- The original Emission limit values were based on historical measurements of Nitric Acid mist so the emission levels are not accurate for NO_x. This ELV will be reviewed during Sector Permit Reviews.

- Reporting of Energy Usage (Form E1) – 2019

Energy usage continues to reduce year on year.

- Reporting Waste Disposal and Recovery (Form R1) – 2019

The tonnage of waste continues to reduce year on year.

- Reporting of Water Usage (Form WU1) – 2019.

Water usage is continuing to be reduced year on year.

- Reporting of Performance Indicators (Form PI1) – 2019

The performance parameters stated in Table S4.2: Performance Parameters are measured against the amount of cadmium used. For all the parameters there has been an improvement against 2018 values.

- Received and reviewed Annual Fugitive Release Reports for 2019 – No fugitive emissions reported for 2019. All incidents were well contained and cleaned up.

No issues identified with above submissions

*****End of Report***

EPR Compliance Assessment Report

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Operator/Permit holder	AB Connectors Ltd	Date	28/02/2020

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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.