

Compliance Assessment Report CAR_NRW0037438

Permit being assessed: BV7443IP.

For: Abercynon Inorganics EPR/BV7443IP, held by AB Connectors Ltd

At: Abercynon Inorganics Ynysboeth Trading Estate , Mountain Ash, Rhondda Cynon Taf, CF45 4SF.

Type of assessment carried out: Audit, Reason: Routine.

On 13/01/2021.

Parts of permit assessed: Effluent Treatment

NRW Lead Officer: Geraint Harris.

Report sent to: Iain Tollan, Plating Shop Manager on 01/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Assessed (A)	

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

Total number of 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

Effluent Treatment Plant Audit

AB Connectors LTD

Permit EPR-BV7443IP

Ynysboeth Trading Estate
Abercynon
Mountain Ash
Rhondda Cynon Taff
CF454SF

During an NRW inspection on the 28th February 2020 the new filter press and settlement tank were witnessed. Considering these new installations, it was thought appropriate to undertake a review of the current ETP management process and upset/emergency preparedness. Due to restrictions as a result of Covid-19, this was conducted remotely. Numerous requests for pertinent information was undertaken throughout this audit process. AB Connector's were quick to supply all the relevant information. The result of this audit process are as follows.

Primary Activity

IPPC:

Section 4.2 A(1)(f): Inorganic Chemicals
Section 7 Part B
Section 2.3 Part B (a)

Directly Associated Activities:

- Raw material storage and handling
- Pre-Treatment, incorporating chemical cleaning, cadmium stripping, acid etch, zinc deposition and aluminium coating.
- Post-Treatment, incorporating, rinsing and passivation.
- Utilities and Services
- Control & abatement systems for emissions to air and releases to sewer
- Storage, handling and despatch of finished materials, waste and other materials.

Where Is The Treated Effluent Discharged:

To Welsh Water Sewer system

Point of Contact:

Iain Tollan

Position:

Plate Shop Manager

NRW Auditor:

Geraint Harris

Date(s) of Audit:

Continuous audit process conducted remotely due to Covid-19

Serious Previous Non Compliances or Enforcement

None in the last 5 years

What are the main treatment processes in site?

e.g. precipitation, neutralisation, stripping, chemical oxidation, ion-exchange, chromium reduction etc.

The effluent treatment plant is based on a total loss system incorporating, Cyanide Oxidation, Chrome Reduction, Neutralisation, Settlement and Filtration. A diagram and a description of the process was provided by AB Connectors for this audit. The effluent from the cadmium plating plant is treated separately through a closed loop ion exchange system for the rinse waters and any concentrated solutions and ion exchange regenerant effluent is sent off site for treatment.

Management System

Does the EMS include the ETP, for example in management reviews, internal audits, impacts and aspects register, environmental improvement objectives?

The following documents were provided:

Management review August 2020

Audit Checklist – Effluent Control AB-EW07-05-09 Audit Sheet

2019 Objectives & Targets

AB Environmental Impacts Plating Shop

Trade Effluent Tracker

Effluent Plant Diagram

AB Connector Effluent Plant General Description

SOP Testing of Chrome Reduction Reaction

SOP Testing of Cyanide Oxidation Reaction

SOP Chromium VI Testing Using HI 93749 Chromium VI Low Range ISM

SOP Cyanide Testing Using HI 93714 Cyanide ISM

SOP Alarm Conditions Effluent Plant Medium and High Risk

SOP Calibration of pH Probes (Red and red Electrode)

SOP Operation of Filter Press Opening

SOP Operation of Filter Press Closing

Effluent Comparison 2020

Cadmium Control

Effluent Comparison

Upon reviewing these documents, the treatment plant is well placed within the sites EMS and is constantly assessed throughout the year. This is conducted through specific audits and through management reviews as part of the Environmental Aspects and Impacts Assessment and Targets and Objectives (2019). The site is registered to ISO 14001 and actively undergoes regular auditing by SGS. One of the more pertinent internal audits is that of Effluent Control. This specifically addresses the effluent treatment plant. In the most recent audit, specific processes that have significant impacts on the effluent quality were audited and evaluated.

More specifically the Reduction of Chrome (VI) to Chrome (III) and the oxidation of Cyanide to Carbonate and Nitrogen. Each of these reactions and subsequent tests were witnessed by more experienced members of staff satisfactorily

Operator Competency

Are there specialist operatives, has training (internal or external) been provided, are staff periodically reviewed and retrained, are there records?

A copy of the training matrix and records of two personnel were provided. There are no technicians employed to specifically run the Effluent Treatment Plant. Instead there is a progression through a grade system which helps employees develop the necessary skills and knowledge to progress their training and undertake more critical roles. Training is provided internally, and certain criteria are tested by the most experienced employees. The development path and subsequent records of Mr M. Williams were provided

and show an increasing knowledge base and level of competence. The testing of his competence against a list of criteria in each grading was undertaken by the Plant Manager. Such training and testing include maintaining treatment chemical levels, operating the filter press process, backwashing the sand filter, spot checks for chrome and cyanide levels, reacting to alarm conditions on the control panel and dealing with spillages.

What Does the Process Control Look Like? What are the target pollutants and full treated breakdown products?

At the ETP, other remote locations, control room, feedback loops, alarms, gauges, cameras, process parameters, control of valves, shut off, divert etc. What are the expected breakdown products from the treatment processes? e.g metal hydroxides, chromium(III), how are these monitored/ analysed? Is any chemical destruction properly controlled and optimised? How is the destruction rate monitored/assured?

The treatment process is controlled by a number of pH and Redox probes in the treatment tanks; these control the addition of the various treatment chemicals. The probes are cleaned and calibrated on a weekly basis to ensure correct operation. The standard operating procedures (SOP's) were provided for the calibration of the pH probes. If the system goes outside the set parameters there is a visual and audible alarm to alert the Plating Shop personnel of a problem. An SOP highlighting the likely causes and responses to various ETP alarms was provided. Pictures of the control panel were also provided as evidence of this. The set points for the correct dosing of chemicals are determined by spot tests on the treated effluents, evidence of this was provided via email. Such evidence included the SOP's for two Chromium (VI) tests and two Cyanide Tests. These spot tests are undertaken daily to ensure Cyanide oxidation and Chrome reduction is achieved. Adjustments are made if the processes go outside the set parameters.

The neutralisation process is critical to ensure precipitation of the metals in the form of metal hydroxide and prevent fugitive releases. If the low-level alarm (pH 9.2) on the Neutralisation controller is activated then this shuts down the transfer pumps from the rinse sumps and the transfer pump to the settlement chamber, thereby preventing untreated or partially treated effluent reaching the settlement chamber. When the rinse sumps reach High Level, an alarm activates a solenoid on the mains water feed to the plating lines shutting down the water to the plating plant.

Similarly, the rinse transfer pumps and settlement feed pump are set at a given rate to allow time for the treatment to take place and for settlement of the metal hydroxide sludge. If the water is turned up in the plating plant, the high-level alarm will sound and the solenoid will activate on the mains water feed, shutting down the water. Booster pumps were installed originally to deal with this additional flow of water but they were deactivated because it was found that their operation was detrimental to the treatment and settlement of the metal hydroxide sludge. If, for any reason there is an issue with the quality of the effluent leaving the settlement tank, it can be diverted back through to the General Rinse Sump (S1) at the start of the effluent plant for additional treatment, preventing discharge to the Outfall tank. A number of IBC's are held on site which can be used to empty tanks if required.

The treatment of Cadmium rinse waters takes place within a closed loop system in which contaminated waters pass through an activated carbon column and then onto Cation and Anion Exchange resins. These remove metals and other chemicals and return the clean water to the plant. As the resins get blinded the conductivity rises, at a set conductivity point, an alarm is activated, the water transfer pumps stop and a "Regeneration Required" alarm is activated. Following an automated sequence, the ion exchange columns are rinsed with water, then the Cation column is flushed with Hydrochloric Acid and the Anion Column flushed with Sodium Hydroxide. This reactivates the resin to enable the system to be put back into service. The discharge from the regeneration process is pumped into IBC'S and taken off site for treatment and disposal.

The target pollutants include Chromium (VI), Cyanide, Copper, Nickel, total Chromium, Cadmium and Zinc. Monitoring is carried out on site daily using internal processes set up for the Atomic Absorption Spectrophotometer for metal content and methods supplied by the manufacturers of the colorimeter for the Chrome (VI) and Cyanide measurements. A sample of the final discharge effluent is taken every day to

check that it meets consent. Dwr Cymru take a sample at least once a month for evaluation. There has only been one incidence relating to a Welsh water sample failing a test. As a result it was re-tested and Dwr Cymru confirmed compliance. A trade effluent tracker has been developed and used to analyse the specific parameters of the effluent. A comparison of the monitoring conducted internally vs Dwr Cymru's, shows a good correlation with AB Connectors results slightly higher than Welsh Water. All are well within the Permitted limits.

Screening and Buffer Tanks

Are they available and what volume and therefore time before system overwhelmed, what is their primary purpose?

There are two sumps used for storing rinse waters prior to being pumped into the appropriate treatment tanks (S1 and S2). Sump 1 (S1) also has the purpose of accepting failed effluent from further along the treatment process. There are level sensors located along the treatment process and in the event extra storage is required, IBC's are stored on site.

Neutralisation

What substances are used and how added, how is pH monitored?

The neutralisation tank is stirred continuously, the pH is increased to approximately 9.5 by the addition of Sodium Hydroxide solution to precipitate out the dissolved metals. This process involves the treatment and subsequent precipitation of Copper, Nickel, Chromium and Zinc in the form of metal hydroxides. The resulting mixture is then pumped to the settlement tank and separated by gravity from the effluent. This process is controlled by a glass pH Electrode mounted in the tank which sends a signal back to a meter on the control panel which activates the Caustic dosing pump. The pH is set at 9.45 (with a low level alarm set at 9.2). This level of about 9.5 appears to be satisfactory for the mixed effluent treatment employed on site, consequently there have been no breaches in the permitted discharge limits. If the low level alarm (pH 9.2) on the Neutralisation controller is activated then this shuts down the transfer pumps from the rinse sumps and the transfer pump to the settlement chamber, thereby preventing untreated or partially treated effluent reaching the settlement chamber. When the rinse sumps reach High Level, an alarm activates a solenoid on the mains water feed to the plating lines shutting down the water to the plating plant. The pH meters are cleaned and calibrated on a weekly basis using standard solutions (pH7 and pH 4), evidence of this was provided.

Precipitation, Coagulation, Flocculation and Settlement,

What chemicals are added and how, what are they targeted for and target pH, are other substances swept out of solution, are subsequent processes applied in sequence to target different species, how is sludge removed?

The neutralised effluent overflows to the Settlement Feed Tank (T4) from where it is pumped to the newly installed Settlement Tank. As the effluent is pumped to the Settlement Tank, Polyelectrolyte (flocculant) is dosed into the pipeline and is mixed with the effluent. The flow rate of flocculant is set at a fixed rate and is deemed suitable and effective for this process. The polyelectrolyte collects the small metal hydroxide particles into larger flocs which aids their separation from the water in the subsequent settlement stage. The polyelectrolyte pump activates whenever the settlement feed pump runs. As the effluent rises up the Settlement tank, the solids fall into the pyramid shaped base, where they are automatically transferred to the Sludge Holding Tank (T6) via the periodic operation of the diaphragm pump.

The separated water flows over the weir at the top of the tank into the Secondary Precipitation Tank (T7). The water in the Secondary Precipitation tank is pumped through a Sand Filter Column (T27) to remove any fine particulate matter and enters the Filtered Water Holding Tank (T9). From here the water passes to the

Outfall Flow Tank (T10) and then to drain via a V Notch weir. An Ultrasonic level transducer measures the flow rate and displays Litres /Hr and Total Discharge on a Flow rate meter.

The slurry of solids removed periodically from the bottom of the Settlement Chamber is passed to the Sludge Tank (T6) and is pumped through a Filter Press to form a semi dry cake. The filtrate passes back to the Acid/Chrome Rinse Tank (S1). Filter cake is removed from the press in a manually controlled operation into a flexible IBC (Tote Bag) which is removed from site by a Licenced Waste Contractor

What process parameters are measured?

Flow, pH, TOC, dissolved oxygen, turbidity, conductivity, redox, temperature, dosage of chemicals etc are these measured under MCERTS?

Effluent flow, pH and Redox are measured throughout the process and are linked to automatic alarms when set parameters are breached. Recording of these parameters are also a requirement of the permit. The probes are cleaned and calibrated on a weekly basis, by trained staff, to ensure correct operation. An Ultrasonic level transducer measures the flow rate and displays Litres /Hr and total discharge on a flow rate meter. Dosage of chemicals are set at fixed rates and are manually changed when chemical analysis reveals inconsistencies with the effluent.

The monthly effluent analysis undertaken by Dwr Cymru monitors the below determinands which AB Connectors trend on a bespoke excel sheet. The use of a contractor for some or all aspects of sampling and analysis is acceptable. The contractor should be accredited to ISO 1702514 for the MCERTS standard, as appropriate. AB Connectors should check with Dwr Cymru to investigate whether the analysis undertaken by them meets the permitted requirements.

Code	Determinands Name	Units	Limit
91	Chemical Oxygen Demand	MG/L	
92	Chemical Oxygen Demand	MG/L	
135	Suspended Solids 1015	MG/L	400
174	Cyanide Free	MG/L	10
192	Phosphorus as P	MG/L	
215	Copper	MG/L	2
245	Zinc	MG/L	2
253	Cadmium	MG/L	
328	Lead	MG/L	2
375	Chromium	MG/L	2
429	Nickel	MG/L	2
9405	Flow Intergrator Unit	Non Specifiable	
9406	Field PH	PH Units	6-11
9862	Non-Ferrous Metals	MG/L	5

What Procedures are in Place if the ETP Fails

How is pollution prevented, how long does it take to recover, what could the risks be to the receiving environment; what are the communication and escalation routes if failure occurs?

The outfall tank is the last tank prior to discharge to the sewer and is the point where internal and Dwr Cymru samples are taken. This is a continuous process that culminates in discharge to the sewer. Monitoring is carried out on site daily using internal processes set up for the Atomic Absorption Spectrophotometer for metal content and methods supplied by the manufacturers of the colorimeter for the Chrome (VI) and Cyanide measurements. There is a possibility that out of spec effluent can discharge prior to testing. This according to AB Connectors would probably be due to fine precipitate getting through because of settling issues rather than something like low pH as this would be indicated by an alarm earlier in the process. There is a divert valve (a picture was provided) on the discharge pipe from the Settlement Tank so that out of spec effluent can be redirected back to the start of the process for retreatment if required. AB Connectors also hold a number of 1M³ IBC's that can be used to pump out tanks for additional treatment or to be taken off site for disposal.

Are there inhibitory pollutants or adverse by-products?

Are there any substances or concentrations of substances in the process, that affect the treatment process? e.g EDTA. If so, how are these controlled?

Plating Solutions can interfere with the settling process also some of the cleaners/ detergents can affect the flocculation process. The actual Plating tanks are not connected to the ETP. If they need to be changed, they are pumped into IBC's for offsite disposal. This typically happens once a year. The Cadmium Plating solution would only be disposed of if it became heavily contaminated and the quality of the plated finish was affected. Otherwise the solution is analysed, and its constituent parts maintained within given parameters. If it did become necessary to discard the solution it would be pumped into IBC'S and taken off site for treatment and disposal, having first sent off samples to determine an appropriate disposal route. The Chrome passivate solution which gives the "Olive Drab" colour to the finished items is changed once or twice a year (dependent on throughput). It is pumped into an IBC and taken off site for treatment and disposal.

Critical Environmental Kit

What is it, are there spares on site, how quickly can replacements be fitted, time lag in ordering replacement and fitting?

There are various pumps and motors held in stock along with a large selection of PVC pipework, unions, and valves. Stock of PVC pipework, vales etc can be replaced within days. Motors can be refurbished (rewound) within a week or two by a local company (Pumpserve). New motors can be replaced within a month. AB Connectors have an internal maintenance team that cover all shifts and are able to address problems as they arise. Due to the age of the plant, there have been issues with the replacement of old equipment with new equipment of the same specifications. Consequently, there have been occasions when the alterations to pipework and fitting are required to accommodate the new equipment. AB Connectors also have an onsite stock of pH and Redox Probes for analysing significant steps within the treatment process. The stock can be replenished by their supplier Mortek in a couple of days of placing the order.

Are there any serious deficiencies in the condition, operation and performance of the plant?

The Effluent Treatment Plant is operating to meet the parameters set by NRW and Dwr Cymru with no permit breaches/fugitive releases recorded. AB Connectors identified a deterioration with the lamella plates within the old settlement tank and so addressed this by installing a new settlement tank. This operates on a slightly different method of slowing the effluent stream through the tank.

Production Process Links to ETP

Are there procedures in place such that operatives on plant can contact ETP to inform them of inputs or changes to inputs, incl. spills, chemical dumping, campaign changes, new substances etc.

The Plating plant is quite small and the ETP is directly adjacent it. Chemical changes are usually planned for maintenance shifts on a Friday morning (only work 4 hrs). Any changes to chemistry or new substances would be directed through the shop manager in conjunction with the team.

Are there any ongoing or future changes or improvements planned?

There are no plans for changes or improvements. The old settlement tank sits in situ and its removal is something that may be considered in the future.

What are the target pollutant effluent concentrations?

Are cadmium, chromium and cyanide concentrations reduced to the absolute minimum? Are BAT ELV's always adhered to?

Taken from the permit:

Substance	Limit
Cadmium	0.05mg/l
Free Cyanide	1.0mg/l
Chromium (VI)	0.1mg/l
Chromium Total	2mg/l
Copper	2mg/l
Nickel	2mg/l
Zinc	2mg/l

Upon looking at the decision document, the indicative BAT techniques relevant to this installation are set out in the following documents:

- IPPC S2.07 - Environment Agency Sector Guidance Note: Guidance on the Surface Treatment of Metals and Plastics by Electroplating and Chemical Means (version 1 September 2004);
- STM BREF - European BAT Reference for Surface Treatment of Metals (STM final draft May 2005);
- IPP S4.03 - Environment Agency Sector Guidance Note: Inorganic Chemicals (draft 1.1 June 2004).

The following was taken from their permit application decision document: "The Agency has assessed the operator's BAT proposals as set out in application form section B2 and compared them against the indicative standards applying to this sector as described in the Sector Guidance Notes. The Agency has also reviewed the operator's assessment of the environmental impact of emissions from the installation". Therefore, the target effluent concentrations are a direct result of the limits set in the latest Surface Treatment of Metals BREF 2006, except for Free Cyanide which states a limit of 0.1-0.2mg/l.

Typical monitoring data of discharged treated effluent, over the last year:

Cadmium 0.005 mg/l vs 0.05 mg/l
 Free Cyanide 0.302- 0.49 mg/l vs 1 mg/l
 Chromium VI 0.079 – 0.095 mg/l vs 0.1 mg/l
 Chromium Total 0.1 – 0.7 mg/l vs 2 mg/l
 Copper 0.2 – 0.93 mg/l vs 2 mg/l
 Nickel 0.1 -0.7 mg/l vs 2 mg/l

Zinc 0.1-0.2 mg/l vs 2 mg/l

As mentioned previously a tracker is used to monitor the analysis of the effluent throughout the year. Furthermore, there have been no breaches in these limits over the last 5 years.

What is the sludge / filter cake composition (incl. moisture)?

Are pollutants merely transferred, such as metals? How is sludge/filter cake moisture controlled and monitored? Is the sludge/filter cake composition being analysed and correctly assessed for hazardous properties and consigned correctly? What is the typical composition of your filter cake? Where is the sludge/filter cake disposed/recycled?? Filter cake presses should be operated at not less than 7 bar and preferably 10-15 bar to reduce its mass, volume and water content.

The filter cake has the appearance of being relatively dry. Information regarding the actual moisture content and the chemical composition of the filter cake were not requested or received. However, the SOP's for operating the press were provided. The operating press stated within the SOP's is recorded at 350bar. The cake looked quite dry upon the last visit and kept its shape when released from the filters. Filter cake is removed from the press in a manually controlled operation into a flexible IBC (Tote Bag) which is removed from site by a Licenced Waste Contractor. AB Connectors have enquired about the possible TFS shipment of their filter cake to recycling facilities within Europe. However, as it stands this is not a reasonable solution and so the filter cake is disposed of within the UK.

What is the percentage efficiency?

How is the efficiency of the treatment process measured? Knowledge of the various input streams, rates and concentrations is essential in establishing how successful the ETP operation is. It is important to understand influent concentrations, in order to control feed rate and treatment operations and to facilitate a treatment efficiency calculation. The latter will be an important consideration in determining appropriate ELVs from the BAT AELs.

Knowledge of the various input streams, rates and concentrations is essential in establishing how successful the ETP operation is. This is satisfied by undertaking spot tests of Tanks 1 and 2 for the reaction of Chromium (vi) cyanide respectively. Any concentrated solutions pumped to the effluent plant are stored in holding tanks and bled slowly into the system. Most of the very concentrated solutions are taken off site for treatment. Furthermore, a daily effluent sample is analysed and corrections made if any deviations are witnessed. The resulting analysis is trended which indicated the effectiveness of the treatment plant. No actual percentage efficiency is calculated but the control systems in place have maintained the effluent parameters to well within the permitted ELV's.

What are the operators key performance indicators?

Compliance with ELVs, some physio-chemical parameter that is key, e.g. pH, total volume, maximum flow rate, temperature etc.

The Following processes are the key performance indicators of the effluent treatment plant:

- Reduction of Chromium (VI) TO Chromium (III) (pH and redox values)
- Oxidation of cyanide (pH and redox values)
- pH of the settlement solution

These are monitored daily and if out of spec. can significantly affect the quality of the final effluent. Ultimately, compliance with the ELV's is the significant performance indicator and analysis of the final effluent is conducted internally daily. The results are trended on an excel sheet to monitor the plants performance. This is good practice and helps to identify any declining performances within the treatment plant.

Are these a recognised BAT technique?

Common Waste Water Treatment in the Chemical Industry BAT Reference document, Surface Treatment of Metals and Plastics BAT Reference document.eg How to comply with your environmental permit Additional guidance for: The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07)

Yes, all the various aspects of the treatment plant are recognised BAT techniques. The Surface Treatment of Metals and Plastics BREF 2006 BAT Reference document is the main source of reference but this is now quite dated. With Brexit now only just in force it is still unclear whether we will continue to follow the EU BREF system in the future or develop a new UK regime for the surface treatment sector. Furthermore, the subsequent treatment of the effluent at Welsh Waters Sewage Treatments is also considered a BAT technique. However, metals should ideally be removed at source as far as possible because sewage sludge tends to end up on agricultural land. The site may want to think about whether if future ELV'S were to tighten are they capable of operating to more restrictive ELV's?

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.