

## Compliance Assessment Report CAR\_NRW0037472

**Permit being assessed:** BM3965IA.

For: Broughton Aircraft Factory EPR/BM3965IA, held by Airbus UK

At: CHESTER ROAD BROUGHTON , CHESTER, CHESTER, CH4 0DR.

**Type of assessment carried out:** Report/Data Review, Reason: Routine.  
On 02/02/2021.

Parts of permit assessed: Annual Performance Review

**NRW Lead Officer:** Berwyn Williams.

**Report sent to:** Andy Denton, Environment Officer on 08/02/2021.

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

| Part of permitted activity assessed (criteria)                                                                 | Assessment result | Permit condition |
|----------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| H2 - Resource Efficiency - Energy efficiency                                                                   | Assessed (A)      |                  |
| H1 - Resource Efficiency - Efficient use of raw materials                                                      | Assessed (A)      |                  |
| E5 - Emissions - Waste                                                                                         | Assessed (A)      |                  |
| E2 - Emissions - Land and groundwater                                                                          | Assessed (A)      |                  |
| E1 - Emissions - Air                                                                                           | Assessed (A)      |                  |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | C4 No impact      | 4.3.1            |
| G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment               | Assessed (A)      |                  |
| E3 - Emissions - Surface water                                                                                 | 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 |
|------------------------------------------|----------------------------|
| 1                                        | 0.1                        |

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 |
|----------|------------------------------------|-------------|
| G4       | Improve Part A & B reporting times | 08/02/2021  |

Action 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.

**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****1. Annual performance reporting**

Condition 4.2 of the permit requires a report on the performance of the permitted activities, annual treatment data, performance parameters and any contamination occurring during the previous year. This was received on the 28 January 2021.

The 2020 annual report was received on 28 January 2021 providing the specified information required by the permit.

Annual report reviewed and the following salient points noted:-

Total waste reduction by 46.68% in absolute terms annually.

Non - recycled waste reduced 54.72% in absolute terms.

A substantial decrease in energy consumption by 19.35% in absolute terms.

Reduction in VOC usage by 36.34% in absolute terms.

Water consumption decrease by 48.66% in absolute terms.

These have all been linked to the reduction in manufacturing output on site due to COVID-19.

**2. Review of monitoring returns and Part A/B Notifications for the periods below (Q1-Q4)**

**Requirements** – (3.5.1) require the operator to maintain an emissions monitoring programme to the frequency detailed in table (3.1, 3.2, 3.3)

Emissions to water no longer needed since agreement with NRW in 2018

Emissions to sewer no longer needed since agreement with NRW in 2018

Emissions to Air is an annual submission

Emissions of VOC is an annual submission

Water usage is an annual submission

Energy usage is an annual submission

Waste produced is an annual submission

NOx reduction is submitted every 2 years and therefore not expected in 2020.

There are no non-compliances in respect to the above, other than 1 breach of NOx, which occurred on 04 December 2019. Part A was late in submission (21/02/2020) for the exceedance of VOC 15 minute average that occurred on 04/12/19. Part B was subsequently not submitted until after the cut-off for 2019 annual OPRA, therefore breach score is taken into consideration in 2020.

Other than this the site is compliant with the permit requirements for the emissions monitoring programme requirements in permit (Conditions 4.3 and 4.4).

3. A Solvent Management Plan is an annual submission and the 2020 IED reduction scheme targets shows the following:

Coating VOC (gross) - 71.01 tonnes - **Equates to 70.38% of target**

VOC waste - 2.3 tonnes

Coating VOC (net) - 68.71 tonnes - **Equates to 68.10% of target**

**VOC reduction projects for 2020 were not implemented due to impact of COVID 19 to the business**

**VOC reduction project for 2021 is targeting paint transfer efficiency**

4. IC 1 is an annual submission of Chromium Reduction until Chromium is removed from process

Chromate free Basic Primer is on target prior to authorisation expiry in 2026.

By end of 2021 initial screening will be complete for Chromate free Alodine alternatives, which will be fine tuned by suppliers for production.

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](mailto: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](mailto: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.