

Compliance Assessment Report CAR_NRW0037529

Permit being assessed: BP1772IZ.

For: Poeton Cardiff, held by Poeton (Cardiff) Limited

At: Poeton (Cardiff) Ltd, 283 Penarth Road, Cardiff, Cardiff, CF11 8UL.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 28/01/2021 - 09/02/2021.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Jason Hamling, HSE & Facilities Manager on 09/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

Poeton Cardiff

EPR/BP1772IZ

NRW received the Annual Returns and Annual Review in accordance with permit conditions 4.2.2. and 4.2.3

Water use:

Water use significantly reduced in 2020 compared to 2019. Poeton reduced their water consumption by 32% and their consumption per operational hour by 32%. The site has replaced its old de-mineralisation plant with a new state of the art reverse osmosis plant. This has improved water use and energy efficiency considerably. Furthermore, Poeton have utilised training and maintenance regimes to improve other areas of water usage. Poeton are to be commended for such improvements.

Energy Use:

Electrical use dropped by 22.4% in 2020 when compared to 2019. In 2020, the only gas heated process tank was removed and replaced. The Overhead gas heaters throughout the general plating area were repaired and serviced. Consequently, gas usage reduced significantly by 51.6%. When combining all the energy parameters together and relating it to the number of operational hours there is a 26.9% Improvement over 2019. NRW are pleased to see such improvements and hope this continues going forward.

Waste:

Waste removed from site increased in 2020. According to Poeton the reason for the increase is due removal of built up waste at the site. NRW recommend that Poeton keep exploring ways to reduce and recycle the waste generated going forward.

Mass release:

The figures received are accepted.

Sewer:

The Effluent discharge is released to the local sewer system operated by Dwr Cymru. There is a requirement under the permit to monitor this effluent on a weekly basis using a composite sample representative of a weeks' worth of effluent discharge. To abide by this, a sampling device is installed at the site. This operates based on the effluent outflow rate and automatically takes a sample of approximately 500ml. This is held in a measuring tank for a few seconds and then approximately 400ml is disposed of. The remaining 100mL is dispensed into the composite holding tank. Laboratory technicians and trained personnel collect these samples on Thursdays with the remaining sample emptied and the tank rinsed. This is to allow for space in the tank for the following weeks samples to be collected and to keep the composite sample at 1 week as per our permit.

Poeton's head office in Gloucester carry out the analysis on each of the weekly samples. Generally, a months worth of samples are collated and send on the first week of the month to Gloucester for analysis.

In addition to the above monitoring Dwr Cymru also undertake their own monitoring of the effluent discharged into their sewer system. This is conducted on a monthly timescale, where a Dwr Cymru employee takes a sample of the composite and a spot sample of the effluent being discharged at that time. On the 6th of November 2020, Dwr Cymru took a spot sample but were unable to take a composite sample due to the tank being empty. When analysed the spot sample for Cadmium was 1.309mg/l. The permitted limit is 0.3mg/l. A composite sample was then taken on 1st December 2020 and was found to be within the permit

limits.

The internal analysis undertaken by the Gloucester partners showed a Cadmium concentration of 0.420mg/L for the composite sample before the spot sample failure and a concentration of 0.263mg/l following the failure. A schedule 5 response was provided for the incident which stated that the reason for the increased Cadmium levels was most likely due to recent cleaning operations. Going forward these cleaning operations will be revised to ensure they have less of an effect on the treatment operations. Furthermore, Poeton have taken samples of their cadmium pit in readiness for disposal. This should further reduce the chance of a future cadmium limit breach.

This is the second time in 2020 that a spot sample has failed the discharge consent limits. On the 23rd January 2020 Dwr Cymru informed Poeton and NRW of excessive Cadmium and Chromium levels from their spot sample. However, this did not result in an exceedance of the levels within the composite sample and henceforth no breach in the conditions and limits within the permit. However, a second failed spot sample is not insignificant and an improvement in the handling and treatment of both Cadmium and chromium will need to be implemented going forward. As a result of this NRW will be undertaking a review of your treatment facility followed by a visit once the restrictions pertaining to the Coronavirus are lifted.

Other requirements:

Permit condition 3.1.4 of your permit states the following:

- 3.1.4 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

Action1: Please state how you intend to comply with this requirement of the permit now that it has been 5 years since this requirement was incorporated into your permit? **Action Due 1st March.**

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.