

Compliance Assessment Report CAR_NRW0037528

Permit being assessed: NP3030BJ.

For: Enersys Newport , held by Enersys Ltd

At: Enersys Ltd , Stephenson Street , Newport, Newport, NP19 4XJ.

Type of assessment carried out: Report/Data Review, Reason: Routine.
On 05/02/2021.

Parts of permit assessed: 4.2.2 Annual Reports 2020

NRW Lead Officer: Rebecca Green.

Report sent to: Jack Brimble, Environmental Lead on 10/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	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

Forms R1, Waste Disposal and Recovery 2020; WU1, Water Usage 2020; E1, Energy Usage 2020 and PI1, Performance Indicators 2020, were received on 29th January 2021.

The Annual Environmental Report Summary 2021 was received on 5th February 2021.

All the reports are accepted.

R1, Waste Disposal and Recovery 2020

Total waste generated in 2020 was about 11% less per tonne of production (ptp) than in 2019, with almost 50% less ptp being sent for disposal and 11% more ptp being sent for recycling.

Total hazardous waste generated was about 10% less ptp than in 2019. The amount sent for disposal was almost 50% lower ptp and the amount sent for recovery increased slightly ptp.

Total non-hazardous waste generated decreased by more than 17% ptp, with waste sent for disposal being 10% less ptp and the amount sent for recycling decreasing by 18% ptp.

The reasons for changes in waste disposal and recovery have been very clearly and comprehensively explained in footnotes to this form. Natural Resources Wales (NRW) very much appreciate the effort that has been put into these explanations.

WU1 Water Usage 2020

The total amount of water used was almost twice as much as in 2019, an increase of more than one and a half times ptp. EnerSys have investigated the reasons for this significant increase. It is partly due to the use of the acid dilution plant and partly due to increased consumption in the paste making process. EnerSys plan to review the paste process in 2021 to identify where water savings could be made.

E1 Energy Usage 2020

The total amount of energy used and the resulting CO₂ were both more than in 2019. Energy use increased by almost 20% ptp and the resultant CO₂ by 18% ptp. This has been identified as being largely due to the failure of batteries after forming. EnerSys have started a project to identify faults before the work goes for forming, which will save wasting energy on faulty products.

Performance Indicators 2020

The performance indicators for energy, waste and water have been discussed above.

Production decreased by more than 30% in 2020, probably due to the uncertain economic climate caused by the covid situation.

The total mass releases of lead were lower than in 2019, but more than 20% higher ptp.

NRW appreciate the notes that have been added to all the forms above, clearly explaining the reasons for any differences with previous years.

This has been a difficult year for manufacturing industry and it is disappointing that production volumes have been so badly affected. The lower production volumes will tend to skew the resource efficiency performance for 2020, even so it is encouraging to see that waste generation has been lower ptp than in 2019. The increase in water use is understandable as EnerSys now dilute their own acid.

The two projects planned for 2021, to investigate areas where water savings could be made and the identification of non-conforming products before they enter the forming cycle, illustrate the benefits of inter-departmental co-operation and the use of 5S and Root Cause Analysis.

NRW commend EnerSys on their continuing commitment to improve their already good environmental performance and will continue to support their efforts where possible.

Annual Environmental Report Summary 2021

The full annual review and interpretation of monitoring results for 2020 was received before the due date of 28th February 2020, demonstrating that the reasons for the late submission of last year's report have been identified and corrected.

All emissions to air, water and sewer were within their respective emission limit values (ELV). Ambient emissions of lead to air have been decreasing since 2015. All the results have been reviewed and interpreted.

The root causes of several higher than normal readings were identified. One was due to a delay in normal maintenance caused by covid restrictions, another was caused by an intermittent fault and a third was happened after a contractor had been working on the equipment. **EnerSys should ensure that they have a system in place for formally accepting equipment back into use after it has been worked on either by third parties or by EnerSys personnel. They should ensure that internal and external personnel are aware of the procedure and that it is followed.**

The interceptor was cleaned in the autumn, resulting in lower lead emissions to water. EnerSys have therefore decided to increase the cleaning frequency for the interceptor.

EnerSys are becoming increasingly proactive in relation to their environmental emissions, taking action when analysis shows higher than normal results, rather than waiting for an ELV to be exceeded. They are using Root Cause Analysis to identify the root cause and continuing to work closely with other departments, such as maintenance and engineering. This approach is clearly working well and EnerSys should be very pleased with the obvious benefits.

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.