

Compliance Assessment Report

Report ID:
CAR_NRW0026370

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

Site	Newport Ceramic Works EPR/BP3532HX	Permit Ref	BP3532HX			
Operator/Permit holder	Kennametal UK Ltd					
Regime	Installations					
Date of assessment	08/09/2016	Time in	10:00	Out	12:30	
Assessment type	Check Monitoring/Sampling					
Parts of the permit assessed	Emissions to air from A6 (oven scrubber)					
Lead officer's name	Green, Rebecca					
Accompanied by	Andy Collins, NRW					
Recipient's name/position	James Wham/ EHS Analyst	Date issued	14/09/2016			

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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	X	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

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

Recently Kennametal (K) have breached the emission limit values (ELV) for particulates from emission point A6 several times. Despite their best efforts they have not fully solved the problem. The manufacturer of the scrubber installed between the drying ovens and emission point A6 has assured Kennametal that it is working properly and is being maintained correctly.

Kennametal requested technical assistance from Natural Resources Wales (NRW) and a meeting was arranged for 8th September 2016.

Agenda

Process overview, oven No.2.
Abatement equipment at emission point A6
Description;
Maintenance procedures;
Maintenance history;
Manufacturer's comments and advice
Review of Schedule 6 Notifications for emission point A6.
Results of Kennametal's internal investigations.
In-situ equipment inspection.
Findings, observations and comments.
AOB.

Attending

Mike Williams, Senior Manager, Earthworks and Ceramics, K;
David Willis, Production Manager, K;
Lloyd Barrett, Maintenance Team Leader, K;
James Wham, EHS Analyst, K;
Andy Collins, Air Quality Specialist, NRW;
Rebecca Green, PPC Compliance Officer, NRW.

The process and abatement equipment were described in detail. The air flow through the scrubber is ~4000m³/hour. There have been problems since the small oven was moved closer to the scrubber and the connecting duct was shortened.

Maintenance procedures, history and manufacturer's recommendations were reviewed. All were satisfactory and the recommendations had been followed.

There have been three breaches of the ELV for A6 since November 2015, varying from 37 to 80mg/m³. Internal investigations have not revealed any significant shortcomings, the only thing that has changed is the distance from the oven to the scrubber.

The equipment was inspected in-situ and detailed discussions followed.

Below are the observations and comments from Andy Collins, NRW's Air Quality Specialist.

"In summary, I would advise that the operator looks into the feasibility of getting a dropout box installed prior to the Venturi scrubber as a first port of call. It appears from our discussions, process overview & changes and a review of the periodic monitoring results, that the scrubber is getting saturated with higher loads of particulates (since the ductwork prior to the scrubber has been shortened). During peaks of this saturation (in conjunction with their process cycle), the concentration levels of these particulates are higher than stipulated in their permit, as evident from the monitoring results.

A dropout box will remove the larger and heavier particles from the air stream before reaching the more efficient Venturi scrubber. This method will help protect the scrubber components from potential abrasion issues and will reduce the particulates load on the separator mechanism, allowing an increased scrubber life in the long term and less maintenance issues in the meantime. Profiling of particulate levels once a dropout box is installed would be essential to see if there is a stable, ongoing improvement in dust levels.

One option to reduce particulate levels would be to alter the fan speed in the process, but this is a delicate balancing act and in my opinion would not alter the dust levels enough to be worthwhile. Another option is to alter the liquid to gas ratio inside the Venturi scrubber, but again if the air is saturated with particulates, increasing the ratio of liquid to gas inside the scrubber would not have a significant effect on levels being monitored at the emissions point. If installing a dropout box would increase the amount of ducting prior to the scrubber, this could in addition help reduce the amount of particulates in the gas stream, by increasing condensation time in the additional ductwork."

Companies that could provide expert advice on monitoring arrangements for dropout box installation were suggested by Andy via email.

Any breaches of the ELV from emission point A6 between 23rd August 2016 and 31st January 2017 will be scored and recorded in the usual way, but the scores will be suspended. Kennametal should continue to notify NRW using a Schedule 6 Notification form, sent as soon as they are aware of the breach.

Action: Kennametal to improve the effectiveness of the abatement equipment at emission point A6 by 31st January 2017, providing monthly updates to NRW on or before 10th October, 14th November, 12th December 2016 and 9th January 2017.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	Kennametal UK Ltd	Date	08/09/2016

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			
E1	X	Improve efficiency of abatement equipment at A6.	31/01/2017

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.