

Compliance Assessment Report

Report ID:
CAR_NRW0032921

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	31/01/2018	Time in	N/A	Out	N/A	
Assessment type	Report/Data Review					
Parts of the permit assessed	4.2.1 Annual Reports 2017					
Lead officer's name	Green, Rebecca					
Accompanied by						
Recipient's name/position	James Wham/ EHS Analyst	Date issued	20/02/2018			

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	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	A	
E5 - Emissions - Waste	A	
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	
H1 - Resource Efficiency - Efficient use of raw materials	A	
H2 - Resource Efficiency - Energy efficiency	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
-----------------------------	---	---	---

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

Forms Air1, Emissions to Air, Energy1, Energy Usage, WaterUsage1, Water Usage and Performance1, Performance Indicators, all for 2017, were received on 31st January 2018.

The End of Year Report 2017 was received on 31st January 2018.

All the reports are accepted.

Production

This increased by 4% in 2017.

Emissions to Air, 1st January to 31st December 2017

During 2017 emission limit value (ELV) exceedances for particulate matter were recorded at four emission points. The highest readings were all significantly greater than their respective ELVs; A1: 103.7mg/m³, (25mg/m³); A3: 38.5 mg/m³, (5mg/m³); A6: 84.75mg/m³, (25mg/m³); A7: 9.7mg/m³, (5mg/m³).

Particulate emissions from A6 are subject to an on-going technical investigation to bring them back within permit limits. Other exceedances were broadly due to failure of the filter media.

Energy Usage 2017

Energy usage increased slightly overall, but was less per tonne of product than in 2016.

Water Usage 2017

Overall water usage and use per tonne of product increased this year, due mainly to increased flushing of the scrubber used to control the air emissions from emission point A6.

Performance Indicators, 1st January to 31st December 2017

Water usage and effluent released per tonne of product increased by 7% compared with 2016. The reason for the increase is given above.

Energy usage per tonne of product decreased by 2.5% compared with 2016. This may be due to changes in product mix during the year.

End of Year Report 2017

The corporate reporting year for Kennametal runs from 1st July to 30th June, which can cause an apparent conflict in conclusions between the calendar year and financial year annual reports.

This report contains a comprehensive review and analysis of the results of air monitoring over several years. Four emission points exceeded their respective ELVs for particulates in 2017. There were two exceedances from emission point A1, two from A3, three from A6 and one from A1. The causes of all the exceedances are known.

Energy efficiency has increased as a result of several projects.

Recycled material is used in the final product and customer waste is also sent for recycling. The amount

sent for recycling nearly doubled in the last financial year. Waste produced per tonne of production was 6.8% less last financial year and shows a reduction of 8.4% so far in this financial year.

The targets for the rest of this financial year are to maintain the existing improvements, improve the energy efficiency of one production process and to solve the emissions problem from emission point A6.

Kennametal continue to set realistic targets and to achieve them. If the problem with particulate emissions from A6 cannot be solved this year then it may be necessary to consider a permit variation.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032921**

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	Date	31/01/2018

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			

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.