

## Compliance Assessment Report

Report ID:  
CAR\_NRW0023743

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

Site	Waun-y-Pound EPR/BX3376IG	Permit Ref	BX3376IG		
Operator/Permit holder	CONTINENTAL TEVES UK LTD				
Regime	Installations				
Date of assessment	07/07/2016	Time in	14:00	Out	16:30
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Emissions to sewer				
Lead officer's name	Green, Rebecca				
Accompanied by	Heather Pepper, Welsh Water				
Recipient's name/position	Chris Johns/ EHS & Site Services Co-ordinator	Date issued	11/07/2016		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
D2 - Incident Management - accidents, emergency and incident planning	A	
E4 - Emissions - Sewer	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	

**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.

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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

On 6<sup>th</sup> July 2016 Continental Teves (CT) informed Natural Resources Wales (NRW) that the sand filter in the effluent treatment plant (ETP) was broken and had to be taken out of service. This meant that there was a risk of CT exceeding the consent limit issued by Welsh Water (WW) and of exceeding the emission limit values set by their EPR permit.

The simplest option to prevent this was to dilute the discharge with mains water; an option that neither WW nor NRW were keen to accept. The delivery time for the spare part for the sand filter was quoted as six weeks, so the non-compliant discharge to sewer could, in theory, continue for six weeks. Though concerned, NRW did not think this would pose a significant environmental risk, but WW were anxious that their sewerage system might be overloaded by either the excessive volume or by the high metal content. NRW and WW decided to visit CT on 7<sup>th</sup> July 2016 to discuss the problem and possible solutions to it.

### **Present at the meeting**

Mark Langshaw, Plant Manager, CT;  
Chris Johns, EHS and Site Services Co-ordinator, CT;  
Philip French, Plating Co-ordinator, CT;  
Heather Pepper, Trade Effluent Officer, WW;  
Rebecca Green, PPC Compliance Officer, NRW.

One of the operators noticed that water on top of the sand bed was cloudy when it should have been clear and the metal concentrations in the discharge to sewer were also elevated. Further investigation revealed holes in both the screw housing and the inner liner. Sand trapped between the bottom of the screw and the housing appeared to have worn through the liner and the stainless steel housing. The unit was taken out of service pending repair.

The steel housing could be repaired locally quite quickly, but the liner is specialised and delivery was quoted as six weeks, which was reduced to less than a week after CT explained the urgency. Two liners have been ordered and delivery is expected on Tuesday 12<sup>th</sup> July. The liner has been added to the critical spares list, with a minimum stock of one. It was not on the critical spares list previously as there had been no failures in 20 years of use. This experience will be shared with all the CT plating sites worldwide.

CT opened an internal customer complaint to identify the problem, any immediate actions and the root causes. In particular they need to identify why sand became trapped as this has never happened before and may be indicative of problems elsewhere in the sand filter.

NRW and WW were asked for permission to discharge above the consent limit for metals until the sand filter is repaired and operational. Given that this is likely to be completed by 13<sup>th</sup> July; that there will not be any plating production on the 8<sup>th</sup>, 9<sup>th</sup> and 10<sup>th</sup> July and that present emission levels are within consent limits, NRW will not take any action if the permit emission limit values for metals, volume or flow are breached between 6<sup>th</sup> and 13<sup>th</sup> July 2016.

However, CT must inform NRW and WW of any emissions above the ELV or consent limits within this period and also continue with their regular daily monitoring.

At the end of July CT should send NRW and WW calculations showing total metals loading for June and

July 2016 so that the effect of the breakdown can be assessed.

The maintenance and control procedures for the ETP will be audited to confirm that all corrective actions have been implemented.

**END.**



## EPR Compliance Assessment Report

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Operator/Permit holder	CONTINENTAL TEVES UK LTD	Date	07/07/2016

### 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			

## 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 reports should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty 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](mailto: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.

