

Compliance Assessment Report

Report ID:
CAR_NRW0033246

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	24/04/2018	Time in	10:00	Out	14:00
Assessment type	Site Inspection				
Parts of the permit assessed	Effluent treatment plant and chemical storage				
Lead officer's name	Green, Rebecca				
Accompanied by	Heather Pepper, Welsh Water				
Recipient's name/position	Philip French/ Head of Plating and Environmental Management	Date issued	10/05/2018		

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	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.

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

The purpose of this meeting was to discuss the causes of the recent breach of the permitted emission limit value (ELV) for chromium (Cr) emissions to sewer and the remedies either proposed or put in place to reduce the likelihood of its happening again.

Present at the meeting -

General Manager, Continental Teves Ebbw Vale, (CT);
Head of Plating and Environment, CT;
Maintenance Manager, CT;
Trade Effluent Officer for CT, Welsh Water, (WW);
PPC Compliance Officer for CT, Natural Resources Wales (NRW).

Agenda

1. Introductions.
2. Current Business Review.
3. Review of permit breach and hypochlorite dosing.
4. Effluent treatment plant history.
5. New effluent control system.
6. Effluent process survey review.
7. Chemical stores project and EPR installation boundary.
8. Site inspection.
9. AOB.

1. & 2. Introductions and Current Business Review

The recent downturn in the automotive market will have a short term effect on CT's business, but the longer term outlook is encouraging. Shane Warbank has taken responsibility for site health and safety matters.

3. Review of Permit Breach and Hypochlorite Dosing

Initial analysis of the Cr gave a result of 0.3 - 0.4mg/L, but this had risen to 2.38mg/L by the time WW took their sample. The hypochlorite dosing pump had been left on over the weekend, causing an excess which oxidised the Cr^{3+} to Cr^{6+} . Cr^{6+} is soluble and so was not precipitated during the normal treatment process. Sodium hypochlorite is used to destroy the nickel (Ni) complex present in the rinse waters from the zinc-nickel (Zn-Ni) plating process. The pump is manually operated and usually switched off at the weekend. If the hypochlorite dosing is insufficient there is a risk that the Ni level in the final discharge to sewer will exceed the ELV. If procedures are not followed there is a risk that either the Cr or Ni levels will exceed their respective ELVs.

This is a critical stage in the effluent treatment process and should not rely solely on manual control.

Action 1: The dosing pump should be added to the critical equipment list.

Action 2: There should be some sort of instrumental endpoint confirmation.

The pump operating procedures have been modified so that the pump is only turned on when Zn-Ni plating starts and turned off four hours after it finishes. This is adequate as an interim measure.

4. Effluent Treatment Plant (ETP) History

The plant was installed c.1995 and has undergone some modification as production processes and volumes have changed. Due to its age the PLC is no longer supported, electrical components are difficult to source and the control panel is corroded. The pH control system could be improved with more modern technology.

A decision was therefore taken to update the plant in two stages.

5. New Effluent Control System.

The first stage will involve the installation of a new control panel, PLC, better control and recording of pH and improved control of other ETP hardware. This stage is due for completion by the end of April 2018.

The second will investigate updating pH probes and meters and improving the extraction to reduce corrosion in the roof space. The hypochlorite dosing pump will be operated via a timer switch. Simply using a timer is not considered sufficient for this critical stage in the treatment process.

Action 3: The opportunity to install instrumental endpoint determination and control should be taken at the earliest stage possible in the ETP improvements.

6. Effluent Process Survey Review

This will involve determining the best processes for precipitating Zn, Ni and Cr. The flocculation chemistry will be assessed for its effectiveness, concentration and dosing rates. Settlement will also be evaluated and alternatives to the present chemistry will be investigated. The effects of cleaner chemistry and Zn-Ni solution chemistry on the precipitation process will be assessed. Alternatives to sodium hypochlorite will be reviewed and alternative pH probes will also be investigated.

The survey will be carried out by a third party.

Both WW and NRW would like to receive a copy of the final report.

Action 4: Instrumental endpoint determination should be investigated as a priority during this review.

7. Chemical Stores Project and EPR Installation Boundary

Chemicals are presently stored outside in bunded shipping containers which are due for replacement. CT propose moving these chemicals to a storage area inside the building next to the plating plant. This will have numerous advantages, both operational and in control of environmental emissions.

The area should be compliant with the appropriate recommendations in CIRIA C736 in order to be acceptable to NRW.

Action 5: The proposed area will be within the present installation boundary, but CT should submit scaled drawings to NRW so that this can be confirmed.

8. Site Inspection

This was mainly of the ETP and the new control panel.

Action 6: WW suggested that displays for pH and flow be added to the control display, if feasible.

Tank bunding was generally in good condition, but some grout between tiles was missing or damaged and should be repaired as soon as possible.

The proposed chemical storage area looks suitable.

9. AOB

There have been some problems in handover from the previous manager responsible for environmental matters to the present one.

Change procedures will be therefore audited this year and will also consider changes to the ETP plant and procedures.

A separate audit on all parts of the ETP operation and control will be carried later in the year.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033246**

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	Date	24/04/2018

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.