Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: NP3030BJ/0256553

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

Site	Enersys Newport EPR/NP3030BJ			Permit Ref	NP3030BJ		
Operator/ Permit holder	Enersys Ltd						
Date	27/01/2016			Time in		Out	
What parts of the permit were assessed	Emissions to air, water and sewer, October to December 2015 and performance indicators for 2015						
Assessment	Report/data review	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Paula Terrett, Environmental Officer						
Officer's name	Rebecca Green			Date issued	02/02/2016		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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				**Condition(s) breached**
a) Permitted activities	**1.** Specified by permit	A		
b) Infrastructure	**1.** Engineering for prevention & control of pollution	N		
	2. Closure & decommissioning	N		
	3. Site drainage engineering (clean & foul)	N		
	4. Containment of stored materials	N		
	5. Plant and equipment	N		
c) General management	**1.** Staff competency/ training	N		
	2. Management system & operating procedures	A		
	3. Materials acceptance	N		
	4. Storage handling, labelling, segregation	N		
d) Incident management	**1.** Site security	N		
	2. Accident, emergency & incident planning	N		
e) Emissions	**1.** Air	A		
	2. Land & Groundwater	N		
	3. Surface water	A		
	4. Sewer	A		
	5. Waste	A		
f) Amenity	**1.** Odour	N		
	2. Noise	N		
	3. Dust/fibres/particulates	N		
	4. Pests, birds & scavengers	N		
	5. Deposits on road	N		
g) Monitoring and records, maintenance and reporting	**1.** Monitoring of emissions & environment	A		
	2. Records of activity, site diary, journal & events	N		
	3. Maintenance records	N		
	4. Reporting & notification	A		
h) Resource efficiency	**1.** Efficient use of raw materials	A		
	2. Energy	A		

KEY: **C1, C2, C3, C4** = CCS breach category (*** suspended scores are marked with an asterisk),**
A = Assessed (no evidence of non-compliance), **N** = Not assessed, **NA** = Not Applicable, **O** = Ongoing non-compliance – not scored

Number of breaches recorded	0	**Total compliance score** (see section 5 for scoring scheme)	0

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Form WU1, Water Usage 2015, was received on 27th January 2016.
Water use per unit of production has been reducing since 2012. This year if fell by a further 7% compared with 2014.
The report is accepted.

Form E1, Energy Usage 2015, was received on 27th January 2016.
Energy use per unit of production increased by almost 10% in 2015, after showing a reducing trend in previous years. CO_2 production has shown a similar trend, increasing by almost 8% in 2015.
The report is accepted.

Form R1, Waste Disposal and Recovery 2015, was received on 27th January 2016.
Waste disposal increased significantly in 2015, probably due to the water damage after the fire. Prior to this the amount of waste being disposed of was showing a significant year to year reduction.
The amount of waste recovered per unit of production also seems to be falling, but this may be due to the reduction in total waste generated. Despite the fire, the total amount of waste generated in 2015 was less than in 2014, even if it was more per tonne of production.
EnerSys are to be commended on their obvious efforts to reduce waste generated on site.
The report is accepted.

Form PI1, Performance Indicators 2015, was received on 27th January 2016.
Production fell by 14% in 2015, compared with 2014. The lead mass release per unit of production almost doubled in 2015, compared with 2014.
Trends in water and energy use and waste generation and disposal are discussed under the relevant headings above.
The report is accepted.

Form W1, Emissions to Water, 1st October to 31st December 2015, was received on 27th January 2016.
Lead emissions to water were less than the emission limit value (ELV).
The report is accepted.

Form S1, Emissions to Sewer, 1st October to 31st December 2015, was received on 27th January 2016.
Lead emissions to sewer were within the ELV.
pH did not comply with the ELV of 6 – 11 on one occasion, when it was 5.5. EnerSys are reminded that it is a permit requirement to inform Natural Resources Wales (NRW) of any breach of permit conditions. A reduction of 0.5 pH units is actually a 5 times increase in the acidity of the sample, since the pH scale is a logarithmic one. On this occasion EnerSys will not be issued with any non-compliances for this permit breach, but any further incidents will incur non-compliances for failure to inform NRW and weaknesses in management reporting systems.
The report is accepted.

Form A1, Emissions to Air, 1st October to 31st December 2015, was received on 27th January 2016.
Spot test results from emission points A8, A9, A10 and A11 all exceeded their ELVs, but were within the permitted spot limit values.
The report is accepted.

Form A2, Emissions to Air, 1st October to 31st December 2015, was received on 27th January 2016. There were three instances in 2015 when the average emission rate for the quarter was greater than the ELV. When these results were averaged out for the year they fell below the ELV. All other emission results were within their respective ELVs. Overall, lead emissions have risen in 2015 compared with 2014, but are less than in 2012 and 2013.
The report is accepted.

This has been a difficult business year for EnerSys, not helped by the damage after the fire. In spite of this they have continued to try to use resources more efficiently and to generate less waste. These measures have shown some success and are to be encouraged.
END.

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: NP3030BJ/0256553

This form will report compliance with your permit as determined by an NRW officer			
Site	Enersys Newport EPR/NP3030BJ	Permit	NP3030BJ
Operator/ Permit	Enersys Ltd	Date	27/01/2016

Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.