Compliance Assessment Report

Report ID: CAR_NRW0032739

This form will report compliance with your permit as determined by an NRW officer					
Site	Rassau Battery Manufacturing EPR/BV5386IX	Permit Ref	BV5386IX		
Operator/Permit holder	GS Yuasa Battery Manufacturing Limited				
Regime	Installations				
Date of assessment	16/01/2018	Time in	09:30	Out	11:30
Assessment type	Report/Data Review				
Parts of the permit assessed	As indicated below				
Lead officer's name	Griffiths, David				
Accompanied by					
Recipient's name/position	Selwyn Thomas/ HSE Manager	Date issued	19/01/2018		

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	
D1 - Incident Management - Site security	A	
E1 - Emissions - Air	A	
F1 - Amenity - Odour	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

Routine Site Inspection with Selwyn Thomas – HSE Manager.

- Health Safety discussed general PPE and now new on site walkways that need to be adhered to. Health and Safety card given and warrant checked on entry to site.

- Discussed EUROBAT and lead in Blood Levels – Yuasa gave an update on the drivers and proposed levels in blood in 2019.

- Discussed recent COMAH visit by NRW and HSE and general opinion is that meeting went well and Yuasa have employed with a consultant to compile and prepare the relevant documentation.

- Discussed the forthcoming Operator Monitoring Assessment (OMA) planned for April 2018. NRW to provide Audit preparation details in March 2018. Yuasa discussed in depth the criteria required and expected for the audit and we discussed typical questions and types of evidence required.

- Yuasa Query September 2017 - As discussed, during the last Permit Variation (Permit Version EPR/BV5386IX/V004 dated 13th June 2017) the site removed extraction point A5 from their Permit as the Lead Recycling process that this served was no longer operated. The extraction point and associated filtration system is however still in-situ. Extraction point A12 is currently used for and is listed on the Permit as extracting the Pellet Caster. However the site has recently noticed a reduction in the extraction efficiency of A12 and it is considered that this may be due to the length of the ducting associated with this point along with a natural deterioration due to the age of the unit. Both A5 and A12 are located in Factory 2 (both along the northern edge of the factory. Both include abatement systems and have previously had similar emission limit values associated with their discharges (0.5 mg m^{-3}). A12 operates a bag-filter system, whereas A5 includes a metal mesh filter and two HEPA filters prior to discharge, and is located in the immediate vicinity of the Pellet Caster operation.

  Hence the site is considering re-routing the discharge from the Pellet Caster, to extract via A5 rather than A12. However, this of course will require recognition within the Permit, and we are wondering how we can achieve this most efficiently and effectively. As we do not believe that any technical assessment will be required, it may be that a local agreement can be put in place until such time as the operator needs to formally vary their Permit again, or indeed the variation may be able to be approved as an Administrative only variation if appropriate. However we would welcome your consideration of the most appropriate route to amend the Permit and allow the site to utilise an already available and effective extraction system in place of one which now appears to be struggling to attain the required extraction efficiencies demanded of this process.

  NRW acknowledge that you can re-route the Pellet Caster to A5 as it is effecting efficiency in the process. Our decision is based on that that there are no ELV Changes and the emission point is in the same locality. However, we must be mindful that this amendment must be reflected in the Permit and therefore must be included in any subsequent variations.

- General site inspection focusing on general emission within the factory / installation. No issues were identified and factory was at full production.
- Discussed Q4 and Annual reporting forms – Yuasa still awaiting further information before submission- Forms have been updated reflecting name change.
- Closing general discussions with Selwyn Thomas and Utilities Engineer Gwyn Sullivan

**********end of report**********

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0032739**

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Site	Rassau Battery Manufacturing EPR/BV5386IX	Permit Ref	BV5386IX
Operator/Permit holder	GS Yuasa Battery Manufacturing Limited	Date	16/01/2018

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.