

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

Site	Royal Mint EPR/KP3135KV/V004			Permit Ref	KP3135KV		
Operator/ Permit holder	The Royal Mint Ltd						
Date	24/09/2015			Time in	09:30	Out	14:00
What parts of the permit were assessed	Meeting with Royal Mint and Welsh Water to discuss sulphate emissions to sewer						
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Martyn Grant, Environmental Manager						
Officer's name	Rebecca Green			Date issued		30/09/2015	

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	A	
	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	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	A	
	5. Waste	N	
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	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

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
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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.

Agenda

1. Sulphate concentration since October 2014.
2. Volumes discharged to sewer since October 2014.
3. Use of dilution system.
4. WTP on-going improvement works.
5. Timescale for reducing dilution dependence.
6. AOB.

Attending:

Martyn Grant, Environmental Manager, The Royal Mint (RM);
Jenny Honey, Waste Pipeline Manager, RM;
Sinky Leitch, Head of SHE, RM;
Graeme Smith, Head of Business Support, RM;
Heather Pepper, Trade Effluent Officer, Welsh Water (WW);
Rebecca Green, PPC Compliance Officer, Natural Resources Wales (NRW).

Items 1, 2 and 3

A comprehensive review of the actions and findings to date was given by Jenny Honey.

The sulphate concentration seems to show a reducing trend, although there are still some peaks.

Volumes discharged to sewer are well within the consent limits set by WW for RM.

The need to use the dilution system has reduced significantly since March 2015. The total volume of abstracted water used to bring down the sulphate levels in the effluent discharge has decreased to a total of ~80m³ since January 2015. (RM are permitted to abstract 1Mm³, but only use about half of this amount).

4. Waste Treatment Plant (WTP) on-going improvement works

The laboratory has been installed adjacent to the WTP.

RM are investigating the feasibility of installing in-line monitoring of the incoming process streams. The object is to improve the efficiency of treatment by keeping similar wastes together prior to treatment and then batch treating them.

The WTP is now run by dedicated operators and craft personnel, a philosophy that RM are applying across their operations.

Two new finishing machines will be installed which will reduce the amount of spent sulphuric acid arriving at the WTP. The substitution of sulphuric acid elsewhere is not a priority at the moment, but is being considered as part of the pipeline improvement project.

Soak cleaners contaminated with cyanide are now taken away as hazardous waste, rather than being sent to the WTP for treatment.

There have been fewer shutdowns in production due to backlogs in the WTP. This is mainly due to improved process control in the WTP. The flocculant dilution and dosing system has caused some problems, finally becoming blocked and needing strip down and repair. This has been pointed out to RM on numerous occasions (see the most recent CAR KP3135KV/0235917), with little action apparently being taken.

Overall, the pace and scale of the improvements have changed, but they are continuing at an acceptable rate.

5. Timescale for reducing dilution dependence

RM have numerous improvements that they wish to make to the WTP and requested that their current authorisation from Welsh Water (WW) of 19th March 2015 for the disposal of additional trade effluent be extended until March 2017. Neither NRW nor WW view dilution as an acceptable treatment method and are not minded to extend this authorisation for such a long period.

However, given the progress that has been made to date, we are prepared to agree that the authorisation be extended to 31st March 2016, with a review of progress no later than mid-March 2016.

6a. Pipeline replacement – progress with compliance action plan

The pipeline inspection schedule has been developed and is being carried out. Initial results will be available by the due date of 2nd October 2015.

The review of the use of sulphuric acid in copper plating should be completed by 2nd October 2015. The modified SPL has been seen.

The compliance action plan is on course at the moment and it is most important that it remains so.

6b. Borehole 901

This borehole no longer exists due to the extension of a nearby building. The last readings were taken at the end of August. A new borehole has been sunk to be used for the SPMP.

6c. Filtercake disposal

RM's waste contractor is proposing to bulk up the filtercake off site so that larger loads can be taken to the disposal site. This filtercake is hazardous and must be handled accordingly at a correctly permitted site.

Monthly production is ~450 tonnes, a skip holds ~11 tonnes and the filter press ~1 tonne.

NRW will monitor the progress of any such permit application very carefully.

7. CP2 Inspection

CP2 is back in production. The overheat and level control instruments were seen. The probes have been positioned further away from each other to reduce the danger of bridging between them. Isolator switches have been installed for each of the cleaning tanks on the front of tank 4 where they are easily accessible.

An emergency stop line has also been installed above these tanks. Heaters are now of the "fail to destruction" type and can only get to 120°C before they shut off. These measures should reduce the likelihood of a fire starting in this area in the future.

END.



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Operator/ Permit	The Royal Mint Ltd	Date	19/03/2015

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.

