

Compliance Assessment Report

Report ID:
CAR_NRW0023722

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

Site	Royal Mint EPR/KP3135KV	Permit Ref	KP3135KV		
Operator/Permit holder	The Royal Mint Ltd				
Regime	Installations				
Date of assessment	29/06/2016	Time in	09:45	Out	13:30
Assessment type	Report/Data Review				
Parts of the permit assessed	Slphate emissions to sewer				
Lead officer's name	Green, Rebecca				
Accompanied by	Heather Pepper, Welsh Water				
Recipient's name/position	Martyn Grant/ Environmental Manager	Date issued	04/08/2016		

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	
B4 - Infrastructure - Containment of stored materials	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	X	
E4 - Emissions - Sewer	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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
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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

This meeting is the latest in a series between The Royal Mint (RM), Welsh Water (WW) and Natural Resources Wales (NRW). The meetings were called to discuss the use of abstracted water to dilute RM's discharges to foul sewer so that they would comply with the WW consent limit for sulphates. WW and NRW have agreed from the outset that dilution is not an acceptable treatment method and were eager for RM to gain control over the sulphate treatment process as quickly as possible.

Attending:

Nikki Burge, Head of SHE, RM;
Jenny Honey, Waste Pipeline Manager, RM;
Martyn Grant, Environmental Manager, RM;
Heather Pepper, Trade Effluent Officer, WW;
Rebecca Green PPC Compliance Officer, NRW.

There was no formal agenda for this meeting, it was an update on the plans and actions discussed in the meeting of 12th April 2016.

1). Sulphate Concentration.

The average concentration of sulphate released to sewer has reduced noticeably over the previous three months. The actual concentration of individual samples has also reduced. These are very encouraging results.

2). Use of the Dilution System and Tankers.

There has been no need to use any tankers to remove out of spec effluent for further treatment off-site and the dilution system has not been used since March.

3). Wastewater Treatment Plant (WTP) Improvements.

Flow gauges have been installed on all incoming lines, allowing the contribution of each to the overall volume received to be assessed at a glance on the main control box. The meters have yet to be fully calibrated and the operators trained. Handover is expected w/c 11th July.

Acid and alkali (soap) streams are now separated.

The sulphate auto-analyser is installed and operational, giving a continuous display of the sulphate content. Data is not being collected yet. Training will be provided and handover completed w/c 5th July.

The aluminium dosing stage of the sulphate treatment process is now earlier in the sequence, allowing more time for the chemical reaction to run to completion. This has meant that chemical usage is less, which should result in less aluminium in the filtercake, making it possibly more easy to sell.

The new finishers are in use but there is no data yet to prove that they are using less sulphuric acid.

Other upstream processes have been adjusted to reduce the incoming load on the WTP.

Successful lab trials of a new treatment process will result in a field trial, scheduled to begin in Q2.

4). Timescale for Removing Dilution as a Sulphate Treatment Option.

The arrangements for using the dilution system agreed at the previous meeting on 12th April 2016 and described in CAR_NRW0000168 will become effective from 1st July 2016. The aim is to cease use of the dilution system from 30th September 2016. Progress will be reviewed at a meeting within two weeks of this

date. WW have issued a letter confirming this position.

5). AOB. Nothing was discussed.

Site Inspection.

WTP.

The area was clean and tidy. The new auto-analyser and the flow meter info panel were seen.

Filtercake Skips.

Two were in use, both in acceptable condition. However, there was obvious wear on the front of the skips just where corrosion has been seen previously. This is probably caused when they are loaded to be removed. It might be advisable to reinforce this area of the skip or to apply some sort of rubber buffer to protect this vulnerability. Several completed skip inspection forms were reviewed. They are working well, but the part for recording whether a skip is accepted or rejected is a little ambiguous and could benefit from a slight re-design.

The action identified in CAR_NRW0000168 has been completed.

Nickel Plating Line.

The newly installed bunding was inspected and was clean and tidy.

Dilute Sulphuric Acid Supply Line.

Installation work has just started so it was difficult to assess progress. NRW have been assured that the new system will be commissioned and in use by 8th August 2016.

It is most important that this completion date is not allowed to slip.

RM have made significant progress with their wastewater treatment processes and seem to be on schedule to remove dilution as a way to comply with WW's consent limit for sulphate discharge to sewer. They have collected a lot of data, analysed it and put the results to good use, which is now paying dividends. They are to be congratulated for investigating new ways of treating incoming waste water before it gets to the WTP and for balancing inputs into the plant.

It is most important that the sulphuric acid supply system does not suffer any further setbacks.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	The Royal Mint Ltd	Date	29/06/2016

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			
C2	X	Review layout of form for acceptance of skips collecting filtercake.	30/09/2016

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. 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.