

Compliance Assessment Report

Report ID:
CAR_NRW0000168

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	12/04/2016	Time in	09:45	Out	13:45
Assessment type	Report/Data Review				
Parts of the permit assessed	Meeting with Royal Mint and Welsh Water to discuss sulphate 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	14/04/2016		

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	
C2 - General Management - Management system and operating procedures	C4	1.1.1
D1 - Incident Management - Site security	A	
E4 - Emissions - Sewer	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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

A meeting between The Royal Mint, (RM), Welsh Water (DCWW) and Natural Resources Wales (NRW) was called to review progress with reducing the sulphate content of effluent discharged to foul sewer and reducing the use of abstracted water to control the sulphate content. This meeting was the most recent in a series of six monthly reviews to discuss these problems.

Agenda

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

Attending:

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

1. Introductions.

Nikki Burge has recently joined RM as Head of Safety, Health and Environment.

Items 2 & 3. Sulphate concentration and volumes discharged to sewer since October 2014.

There has been a reduction of 24% in the amount of sulphate discharged to sewer from April 2015 to March 2016 when compared with that from April 2014 to March 2015. This has been achieved through better process control and use of the dilution system.

Volumes discharged to sewer have been well within those specified in the consent limit granted by DCWW.

4. Use of the dilution system.

The dilution system was used four times in the period October 2015 to March 2016, compared with 15 times in the same period for the previous year.

The use of tankers to remove out of specification effluent has reduced by almost 50%, comparing October 2014 to March 2015 with the same period in the following year.

Between April and September 2015 131m³ of abstracted water was used to dilute the effluent before discharge to sewer; between October 2015 and March 2016 this increased to 213m³. There was an incident in January when the dilution system was used inappropriately and this has been addressed by improving operator training. However, the dilution volume used in March was the second highest in the year from April 2015 to March 2016. This infers that the effluent treatment process is still not under sufficient control and is a matter of concern to both DCWW and NRW. This project has been running for more than a year

and whilst some benefits are becoming obvious NRW feels that the treatment process should be under better control.

5. WTP on-going improvement works

There has been a serious commitment to this project from RM, with significant personnel and capital investments either made or planned. Many of these should be installed and commissioned by 31st May 2016.

This project has been approached in two ways, improvement of monitoring and treatment of the incoming waste water and reduction of the sulphate content of the incoming waste.

Equipment to measure the sulphate concentration in the incoming waste water should be on-line by June 2016. This will be linked in to the sulphate treatment chemical dosing pump to enable more accurate treatment of the actual sulphate level, which should result in lower chemical use and less aluminium in the filtercake.

New pipelines are being installed to separate incoming acid and alkaline process waste streams. Flow meters will also be installed to monitor incoming volumes and may be used later on to try to reduce volumes at plant level. The first stage of this project should be completed by May 31st.

New finishing machines which recycle reagents used in the process have been installed and more are planned. These will help to reduce the sulphate burden on the effluent treatment plant.

Other innovative improvements are planned for later in the year.

RM are reminded that they should check the appropriate Bref documents before committing to any new equipment to ensure that it will comply with the Bref recommendations. Relevant Bref documents may include waste water treatment, non-ferrous metals and surface treatment of metals.

6. Timescale for reducing dilution dependence.

RM have requested that permission to use abstracted water to dilute effluent so that it complies with their DCWW consent limit prior to discharge to foul sewer be extended to April 2017.

Neither DCWW nor NRW are minded to agree to this extension. Neither body regards dilution as an appropriate method of waste water treatment. NRW feel that RM should be encouraged to reduce their dependence on the dilution system and extending the permission for too long will defeat this objective.

A compromise was discussed and agreed. Permission to use the dilution system will be extended to June 30th 2016. Further use until 30th September 2016 will be allowed, providing that RM inform both NRW and DCWW each time the dilution system is used. This notification must be within 24 hours of use, unless that use occurs between a Friday afternoon and a Sunday, in which case RM must inform NRW and DCWW before midday on the following Monday. The notification should include as a minimum the reason for use, stating the starting sulphate concentration and the dilution volume used. Details of any remedial action may also be included.

Progress will be reviewed at a meeting to be held by 30th June 2016.

7. AOB

Nothing was discussed.

Site Inspection – ETP

There was a brief inspection of the ETP. Some areas were unfortunately inaccessible due to maintenance. The area was generally clean and tidy and evidence of the installation of some of the new equipment was seen.

One of the skips that receive the filter cake from the filter presses was damaged. There were two holes towards the bottom of the skip that had obviously been there for some time as rust was evident around the edges of both holes. After a similar problem was identified during the waste audit conducted by NRW in July 2014 RM set up acceptance procedures for empty skips to ensure that no damaged ones were allowed on site for use. These procedures were not followed and so a Cat 4 non-compliance has been issued for failure to follow internal procedures.

Action: Review procedures and ensure they are followed. Improve training if necessary. ***Send confirmation of completed action to NRW by 13th May 2016.***

RM have made significant progress with this project since its inception. Their commitment in terms of capital expenditure and personnel is recognised and to be applauded. The process is not yet under reliable control, but NRW have every confidence that this will be achieved in the near future.

END.

EPR Compliance Assessment Report

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Site	Royal Mint EPR/KP3135KV	Permit Ref	KP3135KV
Operator/Permit holder	The Royal Mint Ltd	Date	12/04/2016

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	C4	Ensure skip acceptance procedure is followed. Improve internal training if necessary. Ensure skip supplier is checking skips before sending to Royal Mint.	13/05/2016

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.