

Compliance Assessment Report

Report ID:
CAR_NRW0026466

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	11/10/2016	Time in	10:00	Out	15:00
Assessment type	Report/Data Review				
Parts of the permit assessed	Effluent Treatment and Acid Supply Line				
Lead officer's name	Green, Rebecca				
Accompanied by	Griffiths, Toby				
Recipient's name/position	Martyn Grant/ Environmental Manager	Date issued	19/10/2016		

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	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	X	
B5 - Infrastructure - Plant and equipment	A	
C2 - General Management - Management system and operating procedures	A	
	X	

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.

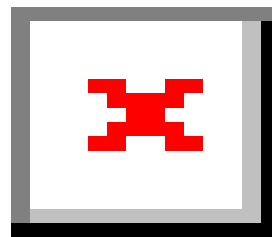
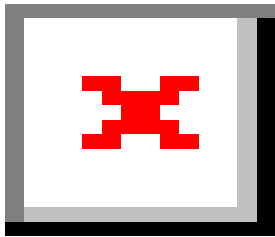
Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

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



The purpose of this visit was twofold –

1. to inspect the new acid supply system and
2. to discuss progress with reducing the concentration of discharges of sulphates to sewer.

1). Acid supply system

Present: Nikki Burge, Head of SHE, The Royal Mint (RM);
Steve Clode, COMAH Area Manager, RM;
Gavin Ambridge, Operations Manager, RM;
Martyn Grant, Environmental Manager, RM;
Toby Griffiths, PPC Compliance Officer, Natural Resources Wales, (NRW);
Rebecca Green, PPC Compliance Officer, NRW.

The project to renew the acid supply pipeline was started after two incidents when acid leaked from pipes. It began in August 2015 and was completed in September 2016. An inspection was necessary to confirm that the project was complete and had been carried out to specification.

The supply pipe was followed from the dilution plant to various manufacturing supply points. In places it was difficult to see the pipe as the scaffolding had not been completely removed. Some long vertical runs would benefit from one or two extra support brackets and some of the elbow joints seemed unnecessarily complicated. These were pointed out during the inspection. All pipes are now above ground and the majority have suitable support. The redundant supply lines are in the process of being decommissioned, flushed through, removed and disposed of.

There are vertical inspection pipes at intervals along the whole installation. They are positioned so that any leaks into the outer skin of the main supply pipe will collect in the sight glass at the bottom of the vertical inspection pipe. A few drops of indicator in the sight glass would make any liquid much easier to see and could differentiate water leaks from acid leaks.

In general the new system appears to comply with the requirements outlined in CAR KP3135KV/0245339, issued 21st August 2015, even though it was completed behind schedule. All other actions requested in that CAR have been completed and so **all actions from CAR KP3135KV/0245339 are now closed.**

There are no maintenance procedures in place at the moment for this supply line. RM need to develop a planned maintenance regime to include both simple daily checks and more detailed regular inspections and to add it to their environmental management system. Documentary evidence of these checks and inspections should be retained. **Action:** *Write and implement a suitable maintenance regime by 28th October 2016.*

2). Sulphate Emissions to Sewer

Present: Jenny Honey, Waste Pipeline Manager, RM;
Martyn Grant, Environment Manager, RM;
Heather Pepper, Trade Effluent Officer, Welsh Water (WW);
Toby Griffiths, PPC Compliance Officer, NRW;
Rebecca Green, PPC Compliance Officer, NRW.

Since the previous meeting in June, abstracted water has not been used to dilute the output from the effluent treatment plant (ETP) so that it complies with the WW consent limit for sulphate. RM have locked the abstraction point so that it can no longer be used.

Sulphate levels in the discharge have fallen from an average of 624mg/L to 534mg/L and aluminium dosing rates have reduced by about 10%. The graph showing actual sulphate levels discharged shows shorter peaks with a much tighter distribution.

The breakdown of a pH probe had caused a problem when it failed to register that a pre-set pH had been reached, allowing the lime dosing pump to continue delivering lime to a treatment tank. There was no threat to the environment as RM dealt promptly with the fault, once it was discovered. However, this may infer that maintenance and inspection procedures need to be reviewed to ensure that they are fit for purpose. The probe has been returned to the manufacturer so that the problem can be identified and it is important that RM know if this is a one-off problem or a fault with this particular model.

RM appear to have much better control of the feed into the ETP and of treatment in the plant, which is paying dividends both for production continuity and discharge levels. All involved with the project should be congratulated, especially since they are determined to carry on applying the principles of continuous improvement.

The agreement to allow dilution as a form of treatment is no longer needed and is therefore withdrawn.

Site Inspection

There were at least 20 IBCs, the waste from recent electrocoagulation trials, on the roadway outside the ETP waiting to be taken in and treated. The only containment in this area is the penstock, which should only be used in an emergency and should not be used for routine containment. These IBCs must be moved to an area which has suitable containment as soon as possible.

The auto-analyser for sulphate in the ETP was not working and appeared to have been out of order since 7th October, with little action having been taken to rectify the matter. This instrument is still in the test phase but nevertheless the fault should have been reported as soon as it was noticed and RM should insist that, being a piece of critical equipment, the manufacturer can ensure repair or a replacement within 24 hours of a fault being reported. This auto-analyser needs to be added to the Critical Equipment Register.

In general, the site and ETP were clean and tidy and the operators take a real pride in their areas and achievements. RM are to be congratulated and NRW hope that they will continue to foster this new-found ethos of ownership.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	The Royal Mint Ltd	Date	11/10/2016

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			
B4	X	IBCs must be stored on an impermeable service in adequately bunded areas. Penstocks are for emergency use only and should not be used for routine secondary containment.	28/10/2016
C2	X	Develop, implement & add maintenance procedures for acid supply pipeline to EMS.	28/10/2016

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 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.