

	EPR Compliance Assessment Report	Report ID: DP3430LX/0231397		
This form will report compliance with your permit as determined by an NRW officer				
Site	TRW Automotive NRW/PPC/DP3430LX/V002		Permit Ref	DP3430LX
Operator/ Permit holder	TRW Limited			
Date	05/03/2015	Time in		Out
What parts of the permit were assessed	4.1.3: Annual Performance report; 4.1.4: Fugitive Emissions review; 4.1.5: Annual EMS review; 2.8.1: AMP review			
Assessment	Report/data review	EPR Activity:	Installation: X	Waste Op: Water Discharge:
Recipient's name/position	Shane Thomas, HS&E Manager			
Officer's name	Rebecca Green		Date issued	06/03/2015

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	A		
	2. Closure & decommissioning	N		
	3. Site drainage engineering (clean & foul)	A		
	4. Containment of stored materials	A		
	5. Plant and equipment	N		
c) General management	1. Staff competency/ training	N		
	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	A		
e) Emissions	1. Air	A		
	2. Land & Groundwater	A		
	3. Surface water	A		
	4. Sewer	A		
	5. Waste	A		
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	A		
h) Resource efficiency	1. Efficient use of raw materials	A		
	2. Energy	A		
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.

Forms S1 for July to December 2014 and E1, WU1 and E1 for 2014 were received on 10th February 2015. An amended E1 form was received on 26th February 2015. An amended R1 form was received on 5th March 2015.

Higher production volumes in 2014 have been reflected in higher water and electricity consumption and in higher waste production. This has been a continuing trend since 2013.

Form S1, Emissions to sewer, July to December 2014

Emissions of nickel, chromium and copper were below their respective ELVs. The pH was within the limits set by the permit. Zinc emissions were above the ELV on 10th December 2014 and TRW were issued with a Cat 4 non-compliance (as it was less than the WW consent limit) for this exceedance. The report is accepted.

Form R1, Waste disposal and recovery, 2014

The amount of waste generated by the site was 37% more than in 2013. The report is accepted.

Form WU1, Water usage, 2014

Water usage increased by more than 17% in 2014. This is due to increased production levels in the new zinc-nickel plant. TRW should investigate ways of reducing water usage in 2015. The report is accepted.

Form E1, Energy usage, 2014

Energy use almost doubled compared with 2013. This is due to the fact that the new zinc-nickel plant uses electric, rather than gas driers. According to the EMS review TRW developed energy KPIs for the site in 2014. These may be useful in reducing energy consumption during 2015. The report is accepted.

P.C. 2.8.1 Accident Management Plan review

This report was received on 5th March 2015.

The report may benefit from the addition of a reference to the complexant destruction stage of effluent treatment. This could be added under item 3 on page 3 of the review.

The report is satisfactory and is accepted.

P.C. 4.1.4 Fugitive Emissions review 2014

This report was received on 5th March 2015.

There were no fugitive emissions from the site in 2014.

According to this report the sewers were last checked in 2006 and the bulk storage tanks in 2010. TRW should consider making provision for these to be re-checked during the next financial year.

The report is satisfactory and is accepted.

P.C. 4.1.5 Annual EMS review 2014 (TRW Corrective Action Timing Plan)

This report was received on 10th February 2015.

Items 3, 4, 15, 16 and 17: Energy management and water efficiency: These are important elements given the increases in use during 2014 and should be continued and developed in 2015.

Items 7 and 8: The replacement of the regeneration resins in both the zinc plating plant and the anodising plant so that the units can be re-commissioned is an on-going objective which is worthwhile and should be pursued.

Item 9: Closed loop system for zinc-nickel process: This is not currently feasible. TRW are to be commended for investigating its feasibility.

Item 19: Improvement of filter press performance: New cloths were fitted in March 2014. If performance has been evaluated since then, please forward the results to Natural Resources Wales (NRW).

Items 20 and 21: Packaging waste reduction: The use of returnable boxes is to be commended.

Item 25: Reduction of chemical dragout from zinc-nickel process using jig design: This is a BAT recommendation for the surface treatment industry. NRW would be interested to see the results of this investigation, if any are available.

Item 31: FMEA for zinc-nickel process: This appears to be incomplete. Please let NRW know when it is complete.

Item 38: Education/training of employees: TRW's commitment to on-going training of their work force in environmental responsibilities is to be commended.

Items 40 – 50: ISO14001 audit observations: It is encouraging to see that all the observations from this audit have been completed.

The report is satisfactory and is accepted.

END.

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Operator/ Permit	TRW Limited	Date	10/02/2015

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.