

Compliance Assessment Report

Report ID:
CAR_NRW0020595

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

Site	TRW Automotive EPR/DP3430LX	Permit Ref	DP3430LX
Operator/Permit holder	TRW Limited		
Regime	Installations		
Date of assessment	24/05/2016	Time in	N/A
Assessment type	Report/Data Review		
Parts of the permit assessed	Actions arising from zinc ELV exceedance in November 2015		
Lead officer's name	Green, Rebecca		
Accompanied by			
Recipient's name/position	Shane Thomas/ HS&E Manager	Date issued	31/05/2016

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
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E4 - Emissions - Sewer	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	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

After the zinc emission in November 2015 which exceeded the emission limit value, various actions were agreed. These were detailed in Compliance Assessment Report (CAR) DP3430LX/0256257.

All the actions have been completed and are now closed.

Action 1: Analyse samples taken when Welsh Water take their samples within 24 hours to check compliance with consent limit. Update procedures and circulate to relevant personnel.

The sampling procedure, SP 035, has been updated and re-issued with several changes to the original way of working. The effluent treatment plant (ETP) daily record sheets have been amended to include the extra information now being collected.

The Schedule 1 notification was sent to an obsolete email address, indicating a weakness in the change procedure. This will be audited by NRW before September 2016.

Action 2: Update change procedures, ensuring that maintenance of correct contact details in all relevant documents is included and circulate to relevant personnel.

All obsolete email addresses have been removed from the system.

Action 3: Update procedures for informing NRW of permit breaches, ensuring that all contact details are correct and that NRW are informed of any future permit breach within 24 hours of discovery. Circulate to relevant personnel and carry out refresher training if necessary.

Procedures were reviewed and are up to date and correct. There was no need for further action.

The site was visited in February and further work was agreed and is recorded on CAR DP3430LX/0258126.

The effluent flows from the zinc plant (Zn) and the zinc-nickel plant (Zn-Ni) were monitored for flow and metal content for 18 working days. The total discharge to sewer is made up from ~80% from the Zn ETP and ~20% from the Zn-Ni ETP. The Zn ETP contributes almost all of the metal concentration in the final discharge. The Zn-Ni ETP discharge has very low metal content and is thus more of a means of dilution, rather than adding to the metal content of the final discharge to sewer.

The composite sample container has been cleaned.

The only remaining action for TRW is to clean the old effluent discharge tank, but this will have to wait until summer shutdown.

NRW will audit the change procedures where they concern reporting and notification and will also review the sampling procedure SP 035.

All the other actions agreed during the meeting have been completed.

END.



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EPR Compliance Assessment Report

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Operator/Permit holder	TRW Limited	Date	24/05/2016

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			

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.