

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report	Report ID: DP3430LX/0258126	
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		
Date	17/02/2016	Time in	10:00 Out 13:00
What parts of the permit were assessed	Effluent treatment, sampling & analysis		
Assessment	Site Inspection	EPR Activity:	Installation: ☒ Waste Op: ☐ Water Discharge: ☐
Recipient's name/position	Shane Thomas, H S & E Manager		
Officer's name	Rebecca Green	Date issued	19/02/2016

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

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.

In November 2015 the zinc (Zn) emission from the effluent treatment plant (ETP) to sewer exceeded both the emission limit value (ELV) and the consent limit agreed with Welsh Water (WW). Natural Resources Wales (NRW) did not find out about this permit breach until January 2016 due to the existence of obsolete email addresses on TRW's system. Three non-compliances were issued, relating to management and analysis procedures. This visit was to discuss progress with updating procedures and to inspect the new anodising plant.

Present at the meeting/inspection

Bill Jones, Technical Manager, TRW;
Shane Thomas, E, H & S Manager, TRW;
Rebecca Green, Compliance Officer, NRW.

1. Permit Variation

This has been duly made but not issued. Installation of the anodising plant is almost complete and some parts have been run through the process.

Annual performance reports for 2016 will encompass the whole site as this will be the permitted area once the variation has been issued. This will make preparation of the reports easier but may give a false impression of resource use, unless TRW can relate the information to the year's production.

Action: RVG - issue CAR giving permission to run full scale commissioning trials before the permit is issued. CAR DP3430LX/0258122 issued and placed on Public Register 17th February 2016. **Complete.**

2. Change Procedures

The confusion over valid email addresses for NRW indicates a weakness in TRW's change procedure. The reason for the Schedule 1 notification email being sent to an obsolete address has been identified and this address will be removed from TRW's system.

The procedures are being updated and the new versions will be re-issued and circulated by the agreed completion date of 23rd March 2016, (see CAR DP3430LX/0256257).

Action: NRW to audit TRW's change procedures concerned with environmental matters and maintenance of contact details *in Q1 2016 (April to June)*. Exact date to be agreed later.

3. Notification Procedure and Training

The procedure has been reviewed and is up to date and correct. There is no need for it to be re-issued. The need for refresher training has been reviewed and is not thought necessary, (see CAR DP3430LX/0256257). **Action complete.**

The late notification was solely due to the use of an obsolete email address and the action agreed in item 2 above should address this problem,

4. Procedure for Analysis of WW Split Samples from the ETP Discharge to Sewer

If the split sample taken by WW had been analysed by TRW when it was taken, it may have been possible for TRW to identify the reason for the high Zn level. The procedures are being updated to reflect this. The changes will include –

- Ensuring that a TRW employee is present when WW take their sample;
- Dip testing the sample before it is divided in two; and
- AAS analysis of the sample immediately if the dip test shows Zn concentration near or above ELV.

In addition TRW will collect flow data from both the old and new V notches so that the proportional contribution of each to the sewer discharge can be calculated.

At present samples are only taken (by TRW and WW) from the old discharge tank. Composite sample containers are fitted to both the old and new outflows. Samples will be taken daily from each and analysed by TRW to quantify the Zn levels in each discharge so that their relative contributions can be calculated.

Action: TRW to report the results of these measurements to NRW by *15th April 2016*.

An inspection of the ETP area also showed that some things could be improved.

- The daily sheets for the ETP should be updated to formalise the extra information that is recorded on them;
- The composite sample container should be cleaned regularly, with another clean container in reserve; and
- The old effluent discharge tank would benefit from emptying and cleaning. It may be possible to carry this out in the summer shutdown.

TRW and WW would benefit from discussing sampling points and methods in view of the increased production from the Zn-Ni plating plant. NRW would be pleased to contribute to this discussion.

5. Site Inspection

Production volumes have increased and working hours have also increased to meet demand. The permitted areas were clean and tidy. Vehicle and personnel segregation has been improved by the installation of metal barriers throughout the site.

The area around the new anodising plant is neat and tidy, showing obvious signs that the installation is on-going. The plant will use water from a reverse osmosis unit rather than demineralised water; the unit is not operational at present.

Observations from the inspection of the ETP are given in 4 above.

END.

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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.

