



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

Site	Mostyn Chemical Works			Permit Ref	BU2357IP		
Operator/ Permit holder	Warwick International Limited						
Date	25/02/2014			Time in	09:30	Out	16:30
What parts of the permit were assessed	Compliance, site developments, permitting, management of change, environmental aspects and site inspection.						
Assessment	Audit	EPR Activity:	Installation	X	Waste Op	Water Discharge	
Recipient's name/position	Peter Bryant - SHE manager						
Officer's name	Ian Oakes			Date issued	31/03/2014		

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	A	
	3. Site drainage engineering (clean & foul)	N	
	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	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	C3	C2.2.2.4, T2.2.5
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	NA	
	4. Pests, birds & scavengers	NA	
	5. Deposits on road	NA	
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	A	
	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

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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.

1. Compliance 2013 summary (further detail provided separately):

3 CCS3 Suspended solids breaches as a result of fungal hyphae growth in Jan, Oct and Nov, and

2 CCS3 Odour and general management condition breaches due to acetic anhydride exotherm in May, and

2 CCS3 Low pH and general management condition breaches due to transfer line blockages in Dec.

Total 7 CCS3 x 4 = 28 and Compliance Band C (range 10 - 30).

2. Compliance Q1 2014

1 CCS3 Suspended solids breaches 289mg/l at 1256m³ on 20 Feb, 293mg/l at 1219m³ on 22 Feb and 275mg/l at 1182m³ on 26 Feb versus 250mg/l limit due to fungal hyphae growth in the two 2000m³ balancing tanks, which were subsequently cleaned out.

3. Acetic anhydride HAZOP actions yet to be formally confirmed pending decision regarding the relocation from Tank Farm 1 to Tank Farm 2 with due consideration of the Occupied Buildings Risk Assessment. Also the potential of moving from one to two tanks to separate virgin and recovered acetic anhydride is being investigated to reduce the potential for exotherm (and tank sizes). Site process control room to move to Admin 2 from opposite the DAED plant. The outcome of the HAZOP and tank relocation is tied in with the control room move. Update to be provided when the relevant decisions have been made (to be reviewed on the next visit).

4. Permitting and I met with Sustainable Direction in Cardiff on the 7th March. Progress was made in determining the scope with the removal of wood washing and drying stages. Flood assessment TAN 15 criteria from FCC has pointed to an 1.4 m increase in foundation height. Work has been undertaken with respect conceptual site impact.

5. Olympian II Project is expected to be commissioned in Q2 2014 and that the plant upgrade will significantly reduce overall site emissions.

6. The future monitoring of emissions to air was discussed. Significant improvements have been made over time to reduce emissions of acetic acid such that now non-compliances are rare. Following the commissioning and optimisation of the Olympian II Project a review of the emissions data for acetic acid should be undertaken (in line with improvement item reference 1.4.1.10). By the end of 2014 all the emission limits should be reviewed and a proposal made for potential reductions. Submission by 31 December.

7. Hyphae and suspended solids monitoring have become more of an issue of late with 3 non compliances in Q1 2014. These breaches have been treated as a single event and scored accordingly. The complication being that the turbidity meter struggles to detect hyphae and thus underestimates the discharge concentration. I suggest the Company evaluates the impact of the hyphae from a BOD/COD perspective to assess the actual impact and to discuss with Natural

Resources Wales the outcome of these findings.

8. Chlorine dioxide is dosed at 5 ppm at the incomer and is approximately 0.5 - 1 ppm at the furthest point of use. Thus far the dosing of the central collection system has been avoided and should continue to be so without the agreement of NRW.

9. Pending the outcome of 7. The Company should make proposals for the reduction in all emission limit values to W1 by end 2014. Submission by 31 December.

10. The trial use of fire fighting foam in the fire detection and prevention system is to be looked at after the commissioning of Olympian II. The company should discuss the option to discharge to sewer with Welsh Water or alternatively trial with water only (which has been used elsewhere).

11. Flood defence repairs to replace the Harris fencing and damaged sections are on-going. An extension is proposed for a further 50 - 75 m along the shoreline in 2014.

12. The outfall inspection risk assessment needs to be reviewed in light of the new RWE wind farm pontoon before the next inspection due in Q1/2 (undertaken with the knowledge of the Mostyn Docks Harbour Master).

13. With respect to borehole sampling, the requirement to monitor is to be made compulsory under IED. I therefore suggest that the Company continues biannually in 2014 and annually 2015 onwards.

14. It is noted that the mill race pipe work had been completed ahead of time.

15. EMS and management of change with respect to Olympian II and Biomass CHP projects to include workforce restructuring and organisational developments, process changes, environmental responsibilities, aspects register (significant aspects, environmentally critical equipment, monitoring) and action plans.

This was discussed at a high level and the Biomass CHP project should be described in a letter to the competent authority with a full description being included in the 5 year COMAH safety report review.

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report	Report ID: BU2357IP/0205806	
This form will report compliance with your permit as determined by an NRW officer			
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Operator/ Permit	Warwick International Limited	Date	25/02/2014

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.			X
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			
E3	C3	Company to assess impact of hyphae from a BOD/COD perspective	31/12/2014

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.