

	EPR Compliance Assessment Report	Report ID: BU2357IP/0247647			
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	29/07/2015		Time in	09:30	Out 16:00
What parts of the permit were assessed	Compliance, site developments, permitting, management of change and site inspection.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Peter Bryant - SHE manager				
Officer's name	Ian Oakes, Carl Jones HSE		Date issued	04/09/2015	

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	N			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	A			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
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	A			
	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	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
-----------------------------	---	--	---

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.

The morning session was a joint Competent Authority meeting (HSE and NRW) covering issues relating to COMAH Intervention Plans for Q2 and site developments that may have potential implications for the Safety Report (and is to be reported separately).

This Compliance Assessment Report covers issues relating to the afternoon session and the Environmental Permitting Regulations 2010, as amended.

1. No non-compliances were noted on the site inspection and the only non-compliance year to date relates to monitoring returns and was categorised as a CCS 3 (refer to CAR 0242432 issued 23 June 2015).
2. An updated organogram was provided for the site senior management structure and the on-going changes to key operational staff was discussed (and includes the Engineering Manager, E & I Specialist, Engineering Planner, Mechanical Maintenance Engineering Supervisor and H & S Advisor). Lubrizol continue to role out procedures across the board, with one example cited as the global Health, Safety, Environment and Security Performance Report.
3. The Olympian II project 'Modification to the AED Recycle Plant' has been subject to an EPR Minor Technical Permit variation V013 issued 20 August 2015 to add a new emission point A24 for residues dilution prior to incineration and discharges at a height of 28 metres. Optimisation continues as does the continued use of emission points A3 and A20 and Plant 6 as agreed with NRW. The improvement programme Table 1.4.1 has been updated accordingly.
4. The Biomass Plant has been withdrawn. Warwick is to review the future requirements for the upgrade of the existing boiler plant.
5. Flood Risk Assessment has been updated March 2015 by FMGLOBAL@ 'Flood Evaluation UKL614' for both 100 and 500 year Dee Estuary Storm Surges.
6. The inspection of the discharge to surface water outfall W1 was carried out on the 27 March 2015 (Diving Report P-1377-R-001) and concluded that the bifurcated section was unsupported (1.5 to 1.7 m above rocky sea bed) putting a strain on the pipe as a result of the disintegration of the supporting concrete plinth, supports and cage. The pipe is in good condition though and all flange bolts are tight and in place with only medium to minimal corrosion. It is proposed to support the outfall legs with grout bags lowered from the work boat. Timescales have yet to be determined.
7. The site is now operating without the ISCO Autosampler (20 samples over 120 minutes) on discharge W1 due to terminal equipment failure and Manufacturing are currently taking a sample midway through the discharge, which is considered to be the most representative. This is backed up with the in-line continuous turbidity meter to alarm in advance of any suspended solids exceedences. The preferred option would be to switch to the in-line turbidity meter for suspended solids monitoring. However, issues remain regarding the apparent inability to measure hyphae, which occasionally can be present in significant quantities. Warwick is to approach Endress

Hauser to discuss feasibility.

8. Bref for Common Waste water and Waste Gas Treatment / Management Systems in the Chemical Sector - Final draft July 2014 (IPPC Bureau website). This was due to be published in late 2015 but now more likely in early 2016 due to clarifications relating to whether limits are the same for discharges to inland and estuarine environments (amongst others) and will come into force with the primary activity Bref when next published. For Warwick this is the Manufacture of Organic Fine Chemicals for which a review date has yet to be specified. This being the case it is unlikely to be published before 2020 though this could change. The Common Waste water Bref would not come into force until 4 years after its publication. Warwick may be required to undertake in-house effluent treatment to meet these new requirements.

9. Warwick correspondence with a local MP relating to a recent general noise complaint was discussed. It is likely that this was due to a standby compressor, which is believed to have had a faulty silencer, which has subsequently been replaced. If Warwick is contacted directly by complainants these can be referred to Natural Resources Wales via our Incident Communications Centre on 0800 80 70 60.

10. A site inspection of all plant areas was undertaken and the AED recycle plant developments were discussed.

	EPR Compliance Assessment Report	Report ID: BU2357IP/0247647
This form will report compliance with your permit as determined by an NRW officer		
Site	Mostyn Chemical Works	Permit BU2357IP
Operator/ Permit	Warwick International Limited	Date 29/07/2015

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.	X
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.