Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BU2357IP/0182246

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	06/05/2013			Time in	00:00 Out 00:00
What parts of the permit were assessed	Compliance assessment following acetic anhydride exotherm in tank T001 on 6 May 2013				
Assessment	Report/data review	EPR Activity:	Installation X	Waste Op	Water Discharge
Recipient's name/position	P Bryant - SHE manager				
Officer's name	Ian Oakes			Date issued	05/06/2013

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	N	
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	N	
	2. Management system & operating procedures	C3	2.3 Management
	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	N	
	5. Waste	N	
f) Amenity	**1.** Odour	C3	2.2.6 Odour
	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	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
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

Number of breaches recorded	2	**Total compliance score** (see section 5 for scoring scheme)	8

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

	INITIALS	DATE
OK FOR PUBLIC REGISTER		3.7.13
COPIED TO PUBLIC REGISTER	JB	EDRM

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 completed within 14 days of an assessment.

1 - Schedule 1 Part B incident investigation notification:

On the 6th May 2013 at 11.35hrs there was an emission of acetic acid vapours from Emission point A1, Tank farm 1 scrubber vent stack. The acetic acid emission occurred as a result of an exotherm in the acetic anhydride storage tank. Following some mechanical failures on the distillation unit water was pumped into the storage tank where it reacted with acetic anhydride. As the tank temperature rose the vapours generated overcame the tank farm scrubbing system and vapours were emitted from the scrubber stack.

Measures taken (or intended to be taken) to prevent a recurrence of the incident:

Modifications have been made to Distillation Unit 4 to prevent a recurrence. Other production areas on site have been assessed to determine if there is the possibility of a similar incident.

Measures taken (or intended to be taken) to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission:

The emission of acetic acid vapours were confined to a small area on site. The site emergency response team set up monitors by the tank farm and applied a water curtain in the area round the scrubber unit to knock out any acetic acid vapours that were coming from the scrubber vent. This was achieved very quickly with the acetic acid smell becoming undetectable within a short time.

North Wales FRS attended site and applied cooling water to the acetic anhydride tank T001. All water was recovered to the effluent treatment plant.

2 - Environmental impact:

It is considered that no significant environmental impact occurred as a result of this incident. CCS Reference 197544

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Operator/ Permit	Warwick International Limited	Date	06/05/2013

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			
C2	C3	Operator recommendations accepted: 1. A new full HAZOP of the plant should be carried out, with an independent chairman, and the resulting actions implemented. 2. Other potential similar mechanisms for water ingress to anhydride rich systems across site should be identified. 3. Options for anhydride storage, which may reduce the potential consequences of an exotherm should be investigated.	30 August 2013
F1	C3	As above	30 August 2013

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.