

	EPR Compliance Assessment Report	Report ID: UP3831ES/0239711			
This form will report compliance with your permit as determined by an NRW officer					
Site	MOLD CHEMICALS (ALYN WORKS)		Permit Ref	UP3831ES	
Operator/ Permit holder	TS Resins Ltd				
Date	19/03/2015		Time in	13:00	Out 16:00
What parts of the permit were assessed	Update on site management changes, and annual return submissions.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Greg Hickman / HSE Officer				
Officer's name	Aled Zachary, Ian Oakes		Date issued	21/05/2015	

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	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	A			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	A			
	2. Management system & operating procedures	N			
	3. Materials acceptance	A			
	4. Storage handling, labelling, segregation	A			
d) Incident management	1. Site security	A			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	A			
	2. Land & Groundwater	A			
	3. Surface water	A			
	4. Sewer	A			
	5. Waste	A			
f) Amenity	1. Odour	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	4. Pests, birds & scavengers	NA			
	5. Deposits on road	A			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A			
	2. Records of activity, site diary, journal & events	A			
	3. Maintenance records	N			
	4. Reporting & notification	A			
h) Resource efficiency	1. Efficient use of raw materials	A			
	2. Energy	A			
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.

Changes to site management since last visit, brief site tour and update on operations.

Tennants group are now the parent company for both Synthite Ltd and TS Resins Ltd operating at the Alyn Works. Greg Hickman has taken on the role of HSE Manager for both Synthite and TS Resins following the retirement of John Hallard in 2014. Paul De Wolf now covers the technical aspect for both sites, while Keith Polden heads engineering and is the site manager for Synthite. Kevin Jones is now the Managing Director for both sites.

The TS Resins Plants are both controlled separately from the Synthite Plant; currently there is no expectation that operators will move between plants to retain individual plant resilience and operator competence.

A new Permit to Work system is being rolled out between both sites based around the historic one used at TS Resins. This will ensure systems at both sites are aligned reducing any risks associated with maintenance works. 11 actions arising as a result of an audit of the existing PTW systems have been implemented into the site wide system.

The Environment Management Systems for both sites remain distinct, apart from some staff being responsible for operations on both sites. Groundwater monitoring sampling has been rationalised and one set of sampling will now be used to monitor both operations.

Observation - During the tour of plant operations the earth point on quarantine tank t-418 was noted as being disconnected as a result of recent maintenance works. Please ensure this is repaired as soon as is practicable.

Reporting of annual emissions to air.

We have reviewed the annual monitoring report as required by Conditions 2.10.1, 2.10.6 & 4.1.2 of the Permit: Reporting of Emissions to Air for the year 2014.

Monitoring submitted for this period shows no breaches of permitted emission limit values.

No action(s) are required.

Reporting of annual energy & water use, waste production and disposal.

We have reviewed the above annual reports as required by Conditions 2.7.1, 2.4.1.3 and 4.1.3 of the Permit: Form E1 - Energy usage, Form R1 - Waste Disposal and recovery, Form PA1 - Performance Indicators, Form WU1 - Water Usage.

These reports are satisfactory and no action is required.

Annual Review of Fugitive Emissions.

Requirement - Permit condition 4.1.4 states the operator shall review fugitive emissions, having regard to the application of Best Available techniques on an annual basis.

Findings - Comprehensive review of fugitive emissions undertaken, no significant emissions identified. Report is satisfactory and no actions are required.

Annual review of environmental improvement targets.

Requirement - Permit condition 4.1.5 states that where the operator has a formal environmental management system applying to the permitted installation which encompasses annual improvement targets, that they should provide a summary report of the previous year's progress against such targets annually.

Findings - Report reviewed and satisfactory.

*****Report Ends*****

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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.