

	EPR Compliance Assessment Report	Report ID: BU2349IL/0239430			
This form will report compliance with your permit as determined by an NRW officer					
Site	MOLD CHEMICALS (ALYN WORKS) EA/EPR/BU2349IL/V002		Permit Ref	BU2349IL	
Operator/ Permit holder	Synthite Limited				
Date	19/03/2015		Time in	13:00	Out 16:00
What parts of the permit were assessed	Review of management changes, noise incident, containment and monitoring submissions.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
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	A			
	3. Site drainage engineering (clean & foul)	A			
	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	A			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	A			
	2. Land & Groundwater	A			
	3. Surface water	A			
	4. Sewer	C4		2.2.2.8	
	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	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)	0.1
-----------------------------	---	--	-----

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.

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.

Noise Incident reported on 13/03/2015

Requirements - Permit Condition 2.9.1 states that the operator shall use BAT so as to prevent or where that is not practicable to reduce emissions of noise and vibration from the permitted installation.

Findings - A report of droning noise (more perceivable at night) was received by NRW from a resident of Alwyn Close, Mold. On investigation it was found that the source of this noise was a high level fan on the Synthite plant, with the noise "tunnelling" between two buildings in a direct line of sight with the complainant's property. This particular item of equipment had already been identified for maintenance via the Preventative Maintenance programme but was scheduled to be addressed in planned April shutdown.

As a result of the complaint the planned maintenance work to this fan was brought forward. Temporary acoustic cladding was positioned around the fan to reduce any noise nuisance in the interim, to which the complainant reported a positive result on the amount of noise being generated. Since this time the required maintenance work to the fan has been completed and permanent cladding of this and other high levels fans is planned for the April shutdown to prevent a recurrence of such an incident.

At present there is no formal noise management plan for the installation but a noise survey is planned for the near future to identify the reference level of noise produced by the site.

This incident has not been scored as a breach of permit conditions as a result of actions taken by the operator. No further action is deemed necessary.

Review of lagoon containment and effluent management.

Both containment lagoons are now HDPE lined and the old unlined effluent storage lagoon is now fully decommissioned. The lining system is integrity tested and any change to groundwater quality adjacent to the lagoons is monitored as part of permit requirements.

Effluent management and rational regarding either on-site treatment or off-site tankering of various effluent streams was discussed. These procedures are documented as part of the effluent treatment manual. Due to upgrades in the effluent treatment plant the quality of effluent discharge to sewer is much improved compared to historical levels, this has also resulted in a substantial saving to the business via the Mogden formula charges from DC/WW. A review of all containment across the site is also due to take place as part of COMAH requirements this year.

Reporting of Emission to air, water and sewer for Quarters 3 & 4 2014/15, Schedule 1 notification 01/05/15.

Requirements - We have reviewed the following quarterly monitoring reports as required by Conditions 2.2.1.3, 2.2.2.3, 2.2.2.8, 2.10.2 , 4.1.4 & 4.1.5 of the Permit:

- 1st October 2014 - 31st December 2014
- 1st January 2015 - 31st March 2015
- Review of fugitive emissions 2014.
- Review of Annual Targets for 2014.

Findings - Monitoring data submitted for these periods shows no breaches of permitted emission limit values for monitoring samples obtained for Q3 or Q4. However a subsequent Schedule 1 notification was submitted for a period where the effluent emissions to sewer exceeded the 25mg/l limit for ammonia. Between the 19/01/15 - 23/01/15 the permitted limit was exceeded, which went undetected due to automated emails on the internal reporting system being sent to the previous HSE manager (now retired). The effluent treatment plant was immediately put onto recirculation on detection of the exceedance and levels were soon back within permitted levels. The internal notification system has already been amended to prevent a recurrence if this incident.

This has been scored a **CCS Category 4** breach of the permit requirements as a result.

No further action(s) are required.

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

	EPR Compliance Assessment Report	Report ID: BU2349IL/0239430	
This form will report compliance with your permit as determined by an NRW officer			
Site	MOLD CHEMICALS (ALYN WORKS) EA/EPR/BU2349IL/V002	Permit	BU2349IL
Operator/ Permit	Synthite Limited	Date	19/03/2015

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.			☐
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			
E4	C4	No action specified	N/A

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.