Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BU2349IL/0254328

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

Site	Alyn Works EPR/BU2349IL			Permit Ref	BU2349IL		
Operator/ Permit holder	Synthite Limited						
Date	30/09/2015			Time in	09:30	Out	15:30
What parts of the permit were assessed	Environmental Management Systems, Raw Materials/Waste Segregation and Storage, Gap analysis, Quarterly Monitoring 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	18/12/2015		

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)	A		
	4. Containment of stored materials	A		
	5. Plant and equipment	A		
c) General management	**1**. Staff competency/ training	A		
	2. Management system & operating procedures	A		
	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	N		
	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	NA		
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	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.

NRW Staff Present:

- Aled Zachary – Regulatory Officer
- Ian Oakes – Technical Specialist

Environment Management System and associated procedures Review.

The site currently operates an ISO14001 accredited management system, which undergoes periodic review both internally and as a result of accreditation audits by BSI. Due to the recent amendments to the ISO14001 standard 2 full days of training are planned to be delivered via BSI on any significant changes as a result.

The environmental aspects register and supporting procedures were reviewed during the audit. Documentation reviewed:

SYNQ16: Scoring of environmental aspects
SYNQ18: Environmental Aspects Evaluation
SYNQ21: Objectives and Targets
SYNQ15 a - d: Documents for change management

No breaches of the permit requirements were identified on reviewing these procedures. All documents appear to be reviewed on a regular basis and are integral to the system's operation.

Maintenance of Environmentally critical equipment was also reviewed during the audit. Synthite has recently adopted the maintenance system from TS Resins, which is based on Microsoft softwear. All of the equipment listed in the system has been done so based on experience of site operations. A member of engineering team Sam Byeross (Reliability Engineer) gave an overview of the system and its operation. Each day job sheets are produced for staff to complete, any issues or tasks left outstanding are flagged on the system for action. The site is to move to a new maintenance management system (Operate) in early 2016 as part of improvements.

For updates on Environmental legislation and legal requirements Synthite employ Cardinal Environmental. They offer a service that includes mail shots with any significant changes to legal requirements, ensuring the site are aware of impending changes and conduct a yearly site visit to ensure the advice remains relevant to the operations. Site staff utilise other sources of information including the HSE, the responsible care unit and the IPPC Bureau to ensure they are not solely reliant on Cardinal for updates.

Recommendation: We recommend that the list of the most significant environmental aspects should be reconciled verses the MATTE's listed in the site COMAH Safety Report.

Non-bulk Raw Material and Waste Storage / Segregation.

All non-bulk raw materials used on site are sourced from a list of approved suppliers within the commodity chemicals market, many of which are available within the Tennants group of companies. Some raw materials are also dictated by customer specification on the end product(s). During the audit the warehousing of these products was inspected:

- No flammables are contained in the warehouse
- There are 2 x flammable stores on site, which are covered, ventilated and bunded.
- Segregation of corrosives and toxics within the warehouse as routine
- No oxidising materials stored other than laboratory scale quantities
- Warehouse had spill kits and a storage inventory including MSDS for all materials

Waste storage was also inspected. There is a dedicated and segregated storage area for all non bulk waste; A7 scrubber waste has a specific tank, while waste Para Formaldehyde is stored in sealed clip top drums. Enviroclear are utilised to dispose of the scrubber waste, usually on a bi-annual frequency. Consignment notes for this waste stream were reviewed.

Internal waste transfer between TS Resins and Synthite of waste effluent streams is documented in a management procedure. Bund liquids are sampled and transferred to the strong effluent tank, plant wash water stored in the pits behind the plant. The internal transfer to the effluent plant or other disposal is determined by a "traffic light system" and capabilities of the effluent treatment plant. Wastes are analysed internally to determine if the ETP is capable of treating the materials, although this sampling is not used to define hazardous properties of the effluent.

Recommendations:

1. Synthite are reminded that they are responsible for ensuring parts A and B of Hazardous Waste Consignment notes are filled out correctly, even if a 3rd party contractor is completing the paperwork on their behalf. Some deficiencies on the Consignment notes were identified during the audit, such as correct hazard component identification and UN numbers.

2. Any internal transfer of waste material between TS Resins and Synthite should be accompanied by the relevant waste transfer or Hazardous Waste Consignment notes. This is to ensure all disposals or transfer of waste products remains auditable externally.

BREF Gap Analysis.

Brief discussion was had regarding the forthcoming Large Volume Organic Chemical Industry and Waste Water Treatment updated BREFs. Both documents are currently in draft form although the latter has recently been approved and should be published in 2016. Both documents have potentially significant implications for the site, in terms of primary operations and operation of the Effluent Treatment Plant.

We recommend both should be reviewed accordingly.

Reporting of Emission to air, water and sewer for Quarters 2 & 3 2015/16.

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: Reporting of Emissions to Air, Water & Sewer for the periods:

1st April 2015 - 30th June 2015

1st July 2015 - 30th September 2015

No breaches of permit limits were recorded for these periods.

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

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: BU2349IL/0254328	
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Operator/ Permit	Synthite Limited	Date	30/09/2015

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.