

 Cyfoeth Naturiol Cymru Natural Resources Wales		Hazardous Waste Audit Report				
This form will report compliance with environmental legislation as determined by an Officer of Natural Resources Wales						
		Ref	BU2349IL			
Operator / Permit holder		Synthite (Mold) Limited			CAU610	
Date		16/11/2023			Time in	10:00
					Out	13:00
Premises	Installation	X	Waste Permit		Exemption	
		Producer			CBD	
Site contact (s)		Jayme Mountford/ Donna Jones				
Officer's name (s)		Phil Harper & Carter Shone			Date issued	27/12/2023

Section 1a Assessment Summary – Hazardous Waste (HW)		
This Assessment is based on the Hazardous Waste (HW) (England and Wales) Regulations 2005 A detailed explanation of any non-compliances identified and actions you may need to take are given in sections 2 & 4 below		
Compliance Summary		
Compliance check type	Assessed during audit	Non-compliance identified
HW Consignment notes (waste received)	No	No
HW Consignment notes (waste removed)	Yes	No
Mixing / treatment of hazardous waste	No	No
HW Records and returns	Yes	No
Storage	Yes	No

Section 1b Assessment Summary – Duty of Care		
This assessment is based on the Duty of Care requirements contained in Section 34 of the Environmental Protection Act 1990 and The Waste (England and Wales) Regulations 2011. A detailed explanation of any non-compliances identified and actions you may need to take are given in sections 2 & 4 below.		
Compliance Summary		
Compliance check type	Assessed during audit	Non-compliance identified
Check correct EWC codes	Yes	No
Written description of waste including quantity and containment	Yes	No
Time and place of transfer	Yes	No
SIC code of the waste holder	No	Yes
Full details of both transferor and transferee	Yes	No
Producer, importer, carrier authorised to receive	Yes	No
Confirm waste hierarchy has been considered	Yes	No

Section 1c Assessment Summary – Waste Assessment

Section 2 – Waste Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- Any non-compliances identified
- All actions requested
- Details of advice given
- Any other areas of concern
- Any examples of good practice

This was a pre-arranged site inspection to complete a site inspection as well as hazardous waste audit.

Synthite (Mold) Limited is a waste producer (cradle site) manufacturing formaldehyde, formaldehyde derivatives and organic chemicals. The site does not accept wastes from other sites.

Consignments notes for Q1 2023 were requested prior to the inspection. Consignment notes for the requested quarter were produced during the audit and emailed to Natural Resources Wales following the visit.

A site tour was provided to view the current waste storage facilities. All wastes segregated depending on waste type and their properties. Waste storage areas were all covered and bunded to provide a suitable level of secondary containment.

A review has been undertaken of waste consignment notes. Multiple waste chapters are used on waste consignment notes, this is consequential to the different activities at the site. No issues with coding of waste have been noted.

Overall waste transfer notes have been completed to a good standard and most of the required information is provided within the documentation for each waste movement. It has been noted that waste transfer documentation is missing the Standard Industrial Classification (SIC) code for the operator, this information should be included on future waste transfer notes.

No further issues have been identified during the audit.

Section 3-Enforcement Response

You must take immediate action to rectify any non-compliances noted in section 1 and prevent repetition. Non-compliance with environmental legislation may result in enforcement action being taken, including criminal prosecutions.

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

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Choose an item.

Section 4- Action(s)

Where non-compliance has been identified in section 1 this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done. If the operator considers that they are unable to comply with any of the actions noted above, or to the deadlines specified, they must contact NRW immediately.

Non-compliance identified	Action Required / Advised	Report section	Due Date
Standard Industrial Classification (SIC) code for the operator not included in waste transfer notes.	Ensure that this information is included on future waste transfer notes.	1b	31 st January 2024

Section 5 - Compliance notes

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

Non-compliance with environmental legislation 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 may include the issue of a formal caution or prosecution
- Dependent upon the type of offence committed, a civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response

See our Enforcement and Civil Sanctions guidance for further information

Not all legal requirements were assessed as part of this audit. It remains your responsibility to ensure that you comply with all relevant environmental legislation and maintain suitable records to evidence your compliance.

Section 6 – General Information

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

[Customer charter](#)

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within fifteen working days of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.