

Compliance Assessment Report CAR_NRW0039819

Permit being assessed: BU2110IS.

For: Barry Site EPR/BU2110IS, held by Cabot Carbon Ltd

At: Barry Site Sully Moors Road , Sully, Penarth, Vale of Glamorgan, CF64 5RP.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 26/04/2022.

Parts of permit assessed: Annual Reports

NRW Lead Officer: Mostyn Wall.

Report sent to: Sian Llewellyn, Senior Quality & Environmental Specialist on 26/04/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
C2 - General Management - Management system and operating procedures	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C2	Site to send EMS document for the classifying a spill and the sites notification procedure of a spill. What quantity or event is classified as significant fugitive spill that results in a schedule 5 notification being sent to NRW?	16/05/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Fugitive Emissions Report 2021

Cabot reported no emissions of a significant nature in 2021. Cabot has a site walkabout and inspection system that identifies and records any drips or wisps at the site. In 2021 29 minor observations were recorded across 10 media categories totally 75kg.

The most significant release in 2021 was from a failed oil reservoir on an air compressor. The compressor was undergoing a service when the reservoir failed and released the contents inside the compressor. The resulting oil spill was contained within the compressor housing and cleaned immediately.

Action.

Site to send EMS document for the classifying a spill and the sites notification procedure of a spill. What quantity or event is classified as significant fugitive spill that results in a schedule 5 notification being sent to NRW?

Maintenance and improvement program 2021

In 2021 Cabot allocated £1.9 million towards improvements. Some improvements include, PTFE pipework replacement to reduce the risk of pipework failures, a new mass spectrometer to replace an existing instrument at its end of life.

In 2022 Cabot have a further £1.6 million budgeted towards reliability improvements.

Cabot have corporate sustainability goals that they aim to achieve by the year 2025. One of these is a Process Safety Management scorecard which aims to help Cabot achieve their goal by reducing significant process safety events by 50%.

Emissions Report 2021

All emissions tests for the year 2021 were below the emission limit value for all emission points (A1, A2 & A3) and are compliant with the permit.

Emissions tests to air (A1) and to the sewer (W1, W2, W3) for the period 1st October 2021 to 31st December 2021 are within the emission limit values and are compliant.

Water and Energy Use in 2021

Both water and energy use in 2021 is lower than 2020 and continues the lowering trend in water and energy consumption at the site. Alongside the trend of reduced energy usage is the associated benefit of lower CO2 produced.

Waste

Waste in 2021 was 382.1 tonnes in total, this is lower than 2020 but higher than previous years. The site is continuing to look for landfill diversion initiatives. In 2021 the site reached an agreement to supply an existing customer with a wide specification product that otherwise would be sent to landfill. The site altered its start-up processing methods to accommodate the demands of the customer. The reduction of waste to landfill and the creation of new products is commendable.

The site continues to focus on reducing off quality production. 2021 saw a low volume of 29MT of

off quality production equating to 0.24% of annual production volume.

EMS Update

The site had two external audits of its EMS system in 2021. The first audit was in March 2021 was a regulatory check against SH&E and the second In May 2021 for recertification to the ISO14001:2015 standard. Both audits were completed with zero non-conformances reported and complimentary comments from the auditors

The site has adapted its training plans to accommodate the shift to homeworking and the pressures of the COVID pandemic.

The sites focused sustainability goals are, Energy efficiency, Community engagement and Diversity and Inclusion.

Energy Intensity

Electricity users (equipment, fans, pumps, motors etc) have been identified and ranked by biggest consumption/cost, Improvement opportunities have been identified for these users and the site is currently ranking these improvement opportunities for impact vs ease of implementation.

Community Engagement –

The site asked employees to propose local schools, charities, or community groups in need of support and we received a number of proposals. The site was able to support 8 of those proposals in 2021 including

- CAVRA local assistance flood support group,
- Christmas for care homes gift appeal
- Snacks and drinks donation for NHS ward staff
- Support for local scout group
- Defibrillator donation to a local athletic club
- PPE donation to local school
- Donation to local school Eco club
- The site was also able to secure a significant donation from Cabot foundation for Ty-Hafan children's hospice

Diversity and Inclusion

Employee Resource Group (ERG) was formed to discuss how the site can positively raise the profile of roles in manufacturing for women and to partner with local schools to raise the profile of our STEM roles, of Cabot and of our industry to girls who may be considering what subjects and what careers to follow.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further 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.

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.