

Compliance Assessment Report CAR_NRW0039877

Permit being assessed: MP3431SP.

For: Barry Aluminium Chlorohydrate Plant EA/EPR/MP3431SP/V002, held by Alembic Manufacturing Ltd

At: Unit 6 Wimbourne Buildings , Atlantic Way, Barry Docks, Barry, Vale of Glamorgan, CF63 3RA.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 29/04/2022 between 10:00 and 10:45.

Parts of permit assessed: Site Inspection

NRW Lead Officer: Dale Padfield, accompanied by Geraint Harris.

Report sent to: David Randall, Director on 05/05/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

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?

No action required.

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

Alembic Manufacturing Limited

Permit MP3431SP

Site inspection and regulator handover 29th April 2022.

The purpose of this visit was to hand regulation of the site under EPR from Geraint Harris (GH) to Dale Padfield (DP). There was no formal agenda for the meeting as it was primarily a site inspection and familiarisation visit for DP to gain an appreciation for site operations and layout.

DP and GH arrived at Alembic at 10:00 on 29th of April 2022 and were met by one of the company directors David Randall, who then proceeded to conduct a tour of the three units. The main unit houses the reaction vessels as well as the large bunded tanks for raw materials and finished products. Alembic Manufacturing Ltd at the Barry docks site predominately produce aluminium chlorohydrate for the cosmetic industry. This is achieved in the reactors where aluminium metal is dissolved in basic aluminium chloride solution and water added to produce aluminium chlorohydrate. Hydrogen is evolved and saturated with hydrochloric acid. Aluminium chlorohydrate is collected in holding tanks prior to filtration. The solution is filtered and stored in a holding tank. NRW were pleased to hear that the waste heat generated during the exothermic reaction is captured and transferred from the reaction vessels using a series of PTFE piping and Coils and utilised in the zirconium manufacturing process. Utilising the waste heat in this way not only makes business sense, saving Alembic money, but also benefits the environment through the reduction of carbon associated with the use of grid electricity that would otherwise need to be employed to heat the zirconium reaction vessel.

The entirety of the main production building is regarded as a bund and should act as a secondary containment for any spills resulting from reaction vessels, IBC's and other drums containing liquid and as tertiary containment for the larger bunded storage tanks. The second unit viewed was the wet and dry storage unit. This unit is also considered a bund and should contain any unintended release from the IBC's and drums stored here. The third unit viewed was the dry goods storage unit and this unit is not considered a bund, therefore only dry materials are to be stored here. There were two IBCs in the unit but when questioned, David Randall confirmed these were empty IBCs deemed end of life and were awaiting disposal. Some damage could be seen to roof of the unit, a result of the recent storm Eunice. Although not posing a hazard there is a risk that water ingress could damage stock / materials, resulting in increased waste, which should be avoided. Alembic should seek to remediate the damaged sections of the roof.

No non-compliances were seen during the visit.

End.

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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.