

Permit reference number: NP3634MU

Operator: Celtic Chemicals Limited

Installation: Celtic Chemicals Limited

Form number: LI

Reporting of Compliance with Low Impact Installation Criteria for 2017

CRITERIA	DESCRIPTION	DEMONSTRATION OF COMPLIANCE																																																												
MANAGEMENT TECHNIQUES	All of the criteria described below must be met without having to rely on significant management effort. In other words, the installation intrinsically must have only a low environmental impact, including under start up, shut down, or abnormal operating conditions.	The installation has continued to operate in line with criteria set out in the EPR. In 2017 processes were controlled appropriately, emergency situations were considered fully, and employee training was conducted in line with the requirements derived from risk assessments. The training was audited in the NRW assessment November 2017 (CAR_NRW0032396) During 2018 CCL will implement processes to ensure compliance with ISO14001.CCL will also adopt the risk based approach to quality processes outlined in ISO9001:2015.																																																												
AQUEOUS WASTE	The installation must not produce more than 50m3 per day of water from process activities conducted at the installation giving rise to effluent. No account need be taken of the volume of water exported from the installation as product	The limit of 50m3 per day has not been exceeded. Waste water has been disposed as follows during the period concerned: <table><tr><th>Date</th><th>Company</th><th>Code</th><th>Qty</th><th>Reference</th><th>Carrier#</th></tr><tr><td>24/01/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>OFT930/TR00A</td><td>CB/VM308287</td></tr><tr><td>03/03/2017</td><td>Hazrem</td><td>060314</td><td>25000</td><td>583</td><td>CBDU5070</td></tr><tr><td>18/04/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1446916</td><td>CBDU5070</td></tr><tr><td>31/05/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1485319</td><td>CB/VM3082BT</td></tr><tr><td>24/07/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1518448</td><td>CBDU8337</td></tr><tr><td>01/09/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1548497</td><td>CBDU8337</td></tr><tr><td>05/10/2017</td><td>Hazrem</td><td>060314</td><td>25000</td><td>1573406</td><td>CBDU5070</td></tr><tr><td>08/11/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1596904</td><td>CBDU8337</td></tr><tr><td>12/12/2017</td><td>Tradebe</td><td>060314</td><td>25000</td><td>1625849</td><td>CBDU8337</td></tr></table> All of the above were EWC 06-03-14 (non-hazardous wash water). Reviewed in audit November 2017 (CAR_NRW0032396)	Date	Company	Code	Qty	Reference	Carrier#	24/01/2017	Tradebe	060314	25000	OFT930/TR00A	CB/VM308287	03/03/2017	Hazrem	060314	25000	583	CBDU5070	18/04/2017	Tradebe	060314	25000	1446916	CBDU5070	31/05/2017	Tradebe	060314	25000	1485319	CB/VM3082BT	24/07/2017	Tradebe	060314	25000	1518448	CBDU8337	01/09/2017	Tradebe	060314	25000	1548497	CBDU8337	05/10/2017	Hazrem	060314	25000	1573406	CBDU5070	08/11/2017	Tradebe	060314	25000	1596904	CBDU8337	12/12/2017	Tradebe	060314	25000	1625849	CBDU8337
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ABATEMENT SYSTEMS/RELEASES TO AIR	The installation must comply with the criteria in this guidance without having to rely on active abatement for releases to the environment outside of any buildings. In particular, releases must not be dependent on continuing or correct operation of equipment, where failure of active pollution prevention systems could result in an unacceptable external release. For example, if the installation depends on active abatement in the form of scrubbers, filters or electrostatic precipitators to achieve the releases to the environment set out in this guidance, it is unlikely that it can be treated as having only a low potential for impact. However abatement systems installed for workers protection only (where abatement is not to attenuate external environmental releases) need not be include in this assessment.	During 2017, no environmentally detrimental emissions were released. Celtic Chemicals has no limit set in Table S 4.1 due to the intrinsically low levels released. Personal exposure continued to be monitored under the company health and safety management system to confirm that the releases are minimal and of no health concern. There were minimal changes to processes during 2017, so very few exposure tests have been conducted. Of the 7 conducted, all results were acceptable. A report of the effectiveness of the extraction was conducted by Pontardawe Air Movements in November 2017. No non-conformities were found.
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GROUNDWATER REGULATIONS	There must be no planned or fugitive emission from the permitted installation into the ground, or any soakaway. Pet cemeteries may be exempt from this criterion provided certain conditions are met, as detailed in the "Landfill (England & Wales) Regulations 2002, Regulatory Guidance Note 8, Pet Cemeteries and Crematoria.	There has been no fugitive emission to ground during 2017 All wastewater is collected on site and disposed of as outlined above. All manufacturing processes are conducted within a bund. No environmentally hazardous materials are stored externally. All internal storage complies with the guidance note HSG 71, regular inspections confirm compliance with OP0017. Storage & disposal of waste is adequately controlled OP0008. Inspections of the wastewater tank, waste water sump, and bund areas were conducted at regular intervals by Ian Thomas (Safety Officer): 30-JAN-17, 14-MAR-17, 2-MAY-17, 21-JUN-17, 13-SEP-17, 25-OCT-17, 16-NOV-17, 19-DEC-17 These are recorded as part of the company's EMS. Findings included: • Corroded valve / replaced • Blue silt / removed • Alarm failure / repaired • Pump failure / repaired • Sump tank hole / repaired • Leak in pipework / repaired • Cracks in cement work / TBC Repairs we also advised under CAR_NRW0032396. This work is to be scheduled in Q1 2018.
WASTE PRODUCTION	The installation must not give rise to more than 1 tonne of Directive waste (or 10-kgs Hazardous Waste) per day, averaged over a year, with not more than 20 tonnes of Directive waste (or 200kg of hazardous waste) being released in any one day.	General Waste/20-03-01 - 14950-kg Veolia (CBEP3195BG) Recylates/15-01-06 - 3445-kg Veolia (CBEP3195BG) Hazardous/Chemical waste 163-Kgs , Red Industries, Stoke (NP3437SZ). In process wastes & expired stock. The limits for low level compliance are not breached.

ENERGY CONSUMPTION	The installation must not consume energy at a rate greater than either 3MW or, if the installation uses a combined heat and power installation to supply any internal process heat, 10MW.	During the year 2017, energy consumption was as follows: Electricity Electricity use averaged at 10892 kwh/month (9876 kwh/month 2015); well below the threshold for LI installations. The slight increase reflects an increase in product realised during the year. LED lighting has been installed in the factory areas and will be extended to warehousing and office areas in due course. Evidenced in CAR_NRW0031136 Gas Gas use averaged 3515 kwh/month (3017 kwh/month 2015); well below the threshold for LI installations. Water use Metered water used on site for the period 2017 = 614 m3 (2016 - 604). As evidenced, the LI criteria is not breached; CCL continues its low resource use. Reviewed in CAR_NRW0032396.
ACCIDENT PREVENTION	You must have in place satisfactory containment measures to prevent fugitive emissions to surface water, sewer or land and ensure that these are adequately maintained at all times. This requirement applies to all substances present on site and in any quantity.	All hazardous chemicals stored at the installation are within UN approved packs. These are stored in line with HSG71 guidance note regarding compatibility and separation distances. All containments are assessed on a regular basis with findings reported in the monthly quality review; documentary evidence retained as part of the procedure. An external flammable store provides protection in case of fire. No hazardous materials are stored externally. CCL has adopted Lean manufacturing techniques which reduce the volume of chemicals stored in processing areas at the factory. This was audited in CAR_NRW0032396 (November 2017).

NOISE	There must be only a low potential for offence due to noise. An installation will not be considered as a low impact installation if it may give rise to noise noticeable outside the installation boundary. This requires the exercise of judgement; taking account of any history of noise complaint from the installation and consideration of the likely off-site noise levels and proximity of sensitive receptors. Particularly when considering new installations, this implies that in any case the rating level should be 5dB(A) or more below the background noise level at any point on the boundary of the installation, whenever the installation is operating. This level may have to be reconsidered if the background and rating noise levels are both very low when assessed in accordance with BS4142:1997.	There have been no issues relating to noise in 2017. A noise, odour and releases to air risk assessment was conducted 19th January 2018; actions from the study are to be addressed in the January 2018 quality review.
EMISSIONS OF POLLUTING SUBSTANCES	There must be no likelihood of a release of any particular polluting substance from the whole installation to the environment at a rate greater than that determined as “insignificant” as set out in the Environment Agency’s IPPC guidance note¹ (or as set out in any subsequent modification issued by the Environment Agency).	There have been no issues relating to emissions in 2017. A noise, odour and releases to air risk assessment was conducted 19th January 2018; actions from the study are to be addressed in the January 2018 quality review.
ODOUR	There must be only a low potential for offence due to odour. An installation will not be considered as a low impact installation if it may give rise to an offensive smell noticeable outside the installation boundary. This requires the exercise of judgement; taking account of any history of odour complaint from the installation and whether this class of activity is known by experience to give rise to smells. A significant possibility or actual history of excursions of fugitive emissions, for example from stored materials, would suggest that the installation could not be treated as having low impact.	There have been no issues relating to odour in 2017. A noise, odour and releases to air risk assessment was conducted 19th January 2018; actions from the study are to be addressed in the January 2018 quality review.

COMPLIANCE HISTORY	If any of the following enforcement actions have taken place (and not been, where appropriate, overturned on appeal) at the same installation under the same management, then it will not be considered further as a low impact installation: - o Prosecution - o Formal Caution - o Suspension Notice - o Enforcement Notice relating to an actual or potential environment incident (All under PPC or the equivalent under previous environmental regimes).	None of the aforementioned actions occurred during 2017.
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Signed



Date 23th January 2018