

Compliance Assessment Report CAR_NRW0040313

Permit being assessed: YP3736UX.

For: Wrexham Metal Finishing Chemicals, held by Almetron Ltd

At: Unit 24 Abenbury Way , Wrexham, LL13 9UZ.

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

On 19/08/2022 between 10:30 and 12:15.

Parts of permit assessed: See Below

NRW Lead Officer: Philip Harper, accompanied by Lara Cubley.

Report sent to: Ian Rogers, Operator on 08/09/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	C3 Minor	3.3.2
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
F1 - Amenity - Odour	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	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
1	4

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
A1	Clean up spillages around vessel 7.	30/09/2022
B1	Housekeeping of bunded storage areas to allow for integrity to be assessed. Maintain french drain near acid storage tanks. Present plan for providing secondary containment to bulk acid tanks.	10/10/2022
C4	Ensure liquids are stored over bunded areas.	30/09/2022

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Natural Resources Wales Senior Industry and Waste Regulation Officers Phil Harper and Lara Cubley visited Almetron Ltd, Unit 24 Abenbury Way, Wrexham Industrial Estate, Wrexham, LL13 9UZ at 10:30 am on the 19th August 2022. This was an announced site inspection.

The site was operational at the time of the inspection.

A1 Specified by Permit

In general, the facility was in a clean and well-maintained condition. However, some reagents, in particular iron oxide had been spilled on the floor below vessel 7. No batches were being prepared in vessel 7 at the time of the inspection, indicating that spills were not being cleaned up following the production of a batch. The spillage has low mobility and was within an area with sealed drainage. No score will be applied on this occasion.

Action: Ensure good housekeeping, clean up spillages around vessels.

B1 Engineering for the Prevention and Control of Emissions.

Outdoor storage areas for raw materials and waste were observed during the inspection. The site reportedly benefits from drainage to a sump with pH monitoring prior to discharge to sewer. This acts as tertiary containment.

Some erosion of the concrete floor could be seen during the inspection. However, due to dry weather, no surface water was present on the site, and it was not possible to assess the integrity.

Action: Clean the site's impermeable floor and check its integrity. Ensure French drain adjacent to acid storage tanks is in working condition.

The site has recently installed tanks which are used for the bulk storage of acids. It is of the understanding that these tanks are double bunded. However, the connections for draw off hoses and valves were located outside of the bunded area and were not provided with secondary containment. The tanks are located on a level concrete platform.

The appropriate level of containment can be found within the CIRIA (C736:2014) guidance document which

can be found using the following link [Design of containment systems for the prevention of water pollution from industrial incidents \(ciria.org\)](https://www.ciria.org/design-of-containment-systems-for-the-prevention-of-water-pollution-from-industrial-incidents).

Further information can be found on pages 29 and 30 of the how to comply document which can be found here [How to comply with your environmental permit \(cyfoethnaturiol.cymru\)](https://www.cyfoethnaturiol.cymru/how-to-comply-with-your-environmental-permit).

Permit condition 3.3.2 states that “All liquids, whose emission to water or land could ~~cause~~cause pollution shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container”.

A category 3 breach has been applied.

Action: Submit a plan of how secondary containment will be provided by the 10th October 2022.

C4 Storage, Handling, Labelling and Segregation

Raw materials, waste and products were segregated on the site. Bulk containers were stored on racking systems which were positioned within the bunded area.

Action: Ensure that all containers are position fully above the bunded area.

F1 Odour

No offsite odours were noted during the inspection.

F3 Dust Particulates and Litter

No dust, particulates or litter were observed outside of the site boundary.

Thank you for your time during the site inspection.

Kind Regards

Phil Harper

Senior Industry and Waste Regulation Officer NE

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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.