

## Compliance Assessment Report CAR\_NRW0040830

**Permit being assessed:** AB3894ZF.

For: Unit C, held by Purolite Limited

At: Purolite International Ltd, Llantrisant Business Park, Llantrisant, Pontyclun, Rhondda Cynon Taf, CF72 8LF.

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

On 15/12/2022 between 09:30 and 11:00.

Parts of permit assessed: Site storage and activities

**NRW Lead Officer:** Mostyn Wall.

**Report sent to:** Emma Manning, Safety, Health and Environmental Manager on 20/12/2022.

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

| Part of permitted activity assessed (criteria)                       | Assessment result | Permit condition |
|----------------------------------------------------------------------|-------------------|------------------|
| B4 - Infrastructure - Containment of stored materials                | Ongoing (O)       | 3.2.3            |
| C2 - General Management - Management system and operating procedures | C3 Minor          | 4.3.5            |
| A1 - Specified by permit                                             | 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 |
|------------------------------------------|----------------------------|
| 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 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| B4       | IBC and drum storage - upper levels of the racked storage needs to be bunded. Ensure that bunded racks are installed that meet the guidance: CIRA 736 and GPP 26: Safe storage of Drums and Intermediate Bulk Containers. Purolite to send NRW plans for chemical storage at the site.                                     | 31/01/2023  |
| C2       | Purolite to update the EMS to include notifications for operational changes made at the installation. Purolite to notify NRW of any plans to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of | 31/01/2023  |

| Criteria | Action needed                                                                                                                                                                                                                                         | Complete by |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|          | an application for approval under the Regulations. Purolite to give a timeframe for the operation of the temporary waste storage                                                                                                                      |             |
| A1       | Purolite to use the H1 tool to identify whether detailed modelling of the A1 stack emissions is required or whether the environmental impact could be screened out as insignificant. Purolite to send in the H1/air quality assessment report to NRW. | 31/01/2023  |

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

A site inspection was undertaken on the 15th November 2022.

In response to the last inspection and CAR form NRW0040363 a tour of the chemical storage yard was undertaken to inspect improvements made by Purolite.

Purolite have installed bunded chemical storage containers in the yard that contain waste materials and flammable materials. Bunded racks for IBC's and drums have been installed in the covered chemical storage area. This is a significant improvement to the chemical storage.

On inspection IBC's and drums on higher racks are not housed on bunded trays or racks. Any spills could potentially reach the storm drain and result in harm to the environment.

**Action:** IBC and drum storage - upper levels of the racked storage needs to be bunded. Ensure that bunded racks are installed that meet the guidance: CIRA 736 and GPP 26: Safe storage of Drums and Intermediate Bulk Containers. Purolite to send NRW plans for chemical storage at the site to show separation and segregation of stored chemicals.

Purolite have updated the IBC stock procedure to include all types of valve types and closing pins used on the site.

The new tank farm construction was inspected. Construction work is still ongoing on the tank farm and bund. A temporary storage container for wastewater from the manufacturing process is located in the yard adjacent to the bunded tank farm. The temporary storage is connected to the building. The storage container is internally bunded and has an additional external bund to capture any additional leaks or spillages.

Purolite is required to notify NRW of any operational change or function of the activities that

may have consequences for the environment. This is to ensure the changes are BAT and pose no risk to the environment or if the changes require a additional permit variation.

The temporary storage for the wastewater is bunded and any water collected in the external bund is tested for contamination before disposal. However, NRW should have been notified prior to its installation and operation. The failure to notify NRW is considered a category 3 non-compliance which could have a minor environmental effect.

**Action:** Purolite to update the EMS to include notifications for operational changes made at the installation. Purolite to notify NRW of any plans to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations. Purolite to give a timeframe for the operation of the temporary waste storage.

Improvement condition 1 was discussed. Additional monitoring of the A1 stack has been undertaken in 2022. An air quality screening assessment is required to investigate the emissions of Toluene, AGE, IMS and Epichlorohydrin from the A1 stack. Purolite stated that a report has been produced and will be sent to NRW.

**Action.** Purolite to use the H1 tool to identify whether detailed modelling of the A1 stack emissions is required or whether the environmental impact could be screened out as insignificant. Purolite to send in the H1/air quality assessment report to NRW.

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](mailto: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](mailto: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.