

Permit reference number: NP3634MU

Operator: Celtic Chemicals Limited

Installation: Celtic Chemicals Limited

Form number: LI

Reporting of Compliance with Low Impact Installation Criteria for 2022

CRITERIA	DESCRIPTION	DEMONSTRATION OF COMPLIANCE	POTENTIAL IMPROVEMENTS FOR 2021
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<p>1.1 GENERAL MANAGEMENT</p>	<p>1.1.1 The operator shall manage and operate the activities:</p> <p>a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and</p> <p>b) using sufficient competent persons and resources.</p> <p>1.1.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.</p> <p>1.1.3 Any person having duties that are or may be affected by the matters set out in these standard rules shall have convenient access to a copy of them kept at or near the place where those duties are carried out</p>	<p>The installation has continued to operate in line with criteria set out in the EPR.</p> <p>Celtic Chemicals operates a risk-based approach to controlling and managing all operational aspects. Risk assessments are far reaching, considering many aspects of the company's environmental, safety, security and compliance. During 2022 the following assessments were undertaken by the quality & compliance team (actions underneath):</p> <ul style="list-style-type: none"> • Fire risk assessment (14/01/22) <ul style="list-style-type: none"> ○ fixed installation electrical testing required in 2022. ○ remove obstruction from fire escape. ○ Conduct evacuation drill. ○ Remove obstructions in U25 fire exit. • Emergency preparedness (30/05/2022) <ul style="list-style-type: none"> ○ Update contact details for interested parties • Site security (27/06/2022) <ul style="list-style-type: none"> ○ Overgrown trees • Environmental monitoring (monthly) <ul style="list-style-type: none"> ○ no issues detected. • Noise, odour, fume & vibration (06/01/2022) <ul style="list-style-type: none"> ○ Health surveillance required • Portable appliances (03/08/2022) <ul style="list-style-type: none"> ○ Compliant • Threat & vulnerability assessment (31/01/2022) <ul style="list-style-type: none"> ○ 17 threats identified (none high risk). Develop a food fraud mitigation plan, food defence plan and business continuity plan. • Site risk zones (23/05/2022) <ul style="list-style-type: none"> ○ No actions • Allergens (10/01/2022) <ul style="list-style-type: none"> ○ Compliant – site remains allergen free • Glass, metal & plastics (10/01/22) <ul style="list-style-type: none"> ○ Compliant 	<p>Review plans to implement IS14001</p>
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<p>1.3 ENERGY EFFICIENCY</p>	<p>1.3.1 The operator shall:</p> <ol style="list-style-type: none"> a) take appropriate measures to ensure that energy is used efficiently in the activities; b) review and record at least every 4 years whether there are suitable opportunities to improve the energy efficiency of the activities; and c) take any further appropriate measures identified by a review <p><i>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.</i></p>	<p>During the year 2022, energy consumption was as follows:</p> <p>Electricity Electricity use averaged at 12076 kwh/month (9948kwh/month 2021); well below the threshold for LI installations.</p> <p>Gas Gas use averaged 400m3/month (486 m3/month 2021); well below the threshold for LI installations.</p>	<p>Continue solar installation plan</p>

<p>1.4 EFFICIENT USE OF RAW MATERIALS</p>	<p>1.4.1 The operator shall:</p> <ul style="list-style-type: none"> a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities; b) maintain records of raw materials and water used in the activities; c) review and record at least every 4 years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and d) take any further appropriate measures identified by a review. 	<p>Water use Metered water used on site for the period 2022 = 801m3 (2021 - 690). A significant portion of this water is exported from site as finished product.</p>	<p>Water Contractor Hydro reneged on water system installation. Review of system in process</p>								
<p>1.5 AVOIDANCE, RECOVERY AND DISPOSAL OF WASTES PRODUCED BY THE ACTIVITIES</p>	<p>1.5.1 The operator shall take appropriate measures to ensure that:</p> <ul style="list-style-type: none"> a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment. SR2009No2 v4 <p>The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.</p> <p><i>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</i></p> <p><i>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.</i></p>	<p>Condition met</p> <p>The limit of 50m3 per day has not been exceeded. There has been no change in volume from the prior year.</p> <p>Waste water generated on site during 2022 circa 30,000 litres. This and the 2021 wastewater were disposed of during 2022 (~80,000 litres). The company will endeavour to dispose of wastewater as generated.</p> <p>Diverted Waste/20-03-01 32,000-kg Veolia (Waste carriers licence CBDU95537 exp. 03/04/2025</p> <p>Mixed Recylates/15-01-06 - 3446-kg Veolia (Waste carriers licenseCBDU95537) expiry 03/04/2025</p> <p>Hazardous/Chemical waste 2021 – ~16,000 Kg (Red industries) CBDU202389 expiry 11/10/2023</p> <p>WEEE waste – Nil</p>	<p>No action</p>								
<p>2.2 WASTE ACCEPTANCE</p>	<p>2.2.1 Waste shall only be accepted if:</p> <ul style="list-style-type: none"> a) it is of a type and quantity listed in table 2.2 below; and b) it conforms to the description in the documentation supplied by the producer and holder. <p>Table 2.2 Permitted waste types and quantities</p> <table border="1" data-bbox="394 1299 919 1404"> <thead> <tr> <th>Waste code</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>11 01 16*</td> <td>Spent ion exchange resins</td> </tr> <tr> <td>19 08 06*</td> <td>Spent ion exchange resins</td> </tr> <tr> <td>19 09 05</td> <td>Spent ion exchange resins</td> </tr> </tbody> </table>	Waste code	Description	11 01 16*	Spent ion exchange resins	19 08 06*	Spent ion exchange resins	19 09 05	Spent ion exchange resins	<p>Condition met No waste accepted on site</p>	<p>N/A</p>
Waste code	Description										
11 01 16*	Spent ion exchange resins										
19 08 06*	Spent ion exchange resins										
19 09 05	Spent ion exchange resins										

<p>2.3 THE SITE</p>	<p>2.3.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan attached to the permit.</p> <p>2.3.2 The activities shall not be carried out on or immediately adjacent to a European Site, SSSI, National Nature Reserve, Local Nature Reserve, Ancient Woodland or National Park.</p>	<p>Condition met for 2022 The installation activities have not been conducted outside of the permitted area.</p> <p>During 2023, the site will be extended to include Unit 20, Kenfig Industrial Estate. This will be notified to NRW in due course.</p>	<p>Maintain compliance.</p>
<p>3.1 EMISSIONS TO AIR, WATER OR LAND</p>	<p>3.1.1 Substances from point source emissions to water or air shall not be released at a rate that is greater than that determined as “insignificant”, as set out in the Environment Agency’s H1 Environmental Risk Assessment.</p> <p>3.1.2 There shall be no direct discharge of aqueous waste within 10km upstream of a European Site or a SSSI; within 100 metres upstream of a National Nature Reserve, Local Nature Reserve or Ancient Woodland, or within a National Park.</p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>Condition met There has been no significant change to operations at the installation, therefore emissions to air will have remained as previously reported i.e. insignificant. Celtic Chemicals has no limit set in Table S 4.1 due to the intrinsically low levels released.</p> <p>There is no release of aqueous waste from the installation, all aqueous waste in collected in a storage tanks /IBC’s for disposal by authorised waste contractor.</p> <p>There has been no fugitive emission to ground or water sources during 2022.</p> <p><i>There has been an increase in wastewater held on site during 2021; this was discussed in NRW site visit March 2020. Water treatment system has had issues at installation; mediation with the contractor continues. Initially the installation was complicated by the pandemic and the delay’s it caused. Later issues are resultant from the inability of the contractor to supply the system promised. CCL is currently taking legal action to reach a resolution.</i></p> <p>The legacy wastewater referred to above was disposed of in 2022. The water system is not currently functional, therefore any water will be disposed of via an approved contractor during 2023 (until such time the system is functioning).</p> <p>There is low potential for releases to ground.</p> <p>All production processes are assessed for environmental impact as part of the company’s new product development process & are conducted within a bund wall to prevent releases.</p> <p>All storage is compliant with HSG 71.</p>	<p>Maintain compliance & source an alternative water treatment contractor to review the system.</p>

<p>3.2 EMISSIONS OF SUBSTANCES NOT CONTROLLED BY EMISSIONS LIMITS</p>	<p>3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.</p> <p>3.2.2 The operator shall:</p> <ul style="list-style-type: none"> a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan; b) (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency. <p>3.2.3 All liquids in containers, whose emission to water or land could 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.</p> <p><i>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.</i></p> <p><i>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).</i></p>	<p>Condition met</p> <p>There has been no significant change in operations at the installation in 2022, therefore there has been no release of substances not controlled by limits. Any change in process or new process development is subject to a risk assessment that covers environmental impacts.</p> <p>All potentially polluting liquids are subject to primary and secondary containment. The secondary containments are periodically checked for integrity/suitability.</p> <p>There have been no issues relating to emissions in 2021. A noise, odour and releases to air risk assessment was conducted January2022.</p> <p>There has been no accidental release of polluting substances, therefore no requirement to report.</p> <p>‘Releases to environment’ is embedded in the NPD process. Consideration is given at a very early stage.</p>	<p>Review installation of water system.</p>
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<p>3.3 ODOUR</p>	<p>3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable, to minimise, the odour.</p> <p>3.3.2 The operator shall:</p> <ul style="list-style-type: none"> a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan; b) (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency. <p><i>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.</i></p>	<p>Condition met</p> <p>The activities at the installation are intrinsically low odour. There has been no accidental release of malodorous substances, and no complaint received of this nature. As a result, there has been no requirement to report.</p> <p>There have been no issues relating to odour in 2022.</p>	<p>No action</p>
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<p>3.4 NOISE AND VIBRATION</p>	<p>3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration.</p> <p>3.4.2 The operator shall:</p> <ul style="list-style-type: none"> a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan; b) (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency. <p><i>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.</i></p>	<p>Condition met</p> <p>The operations at the installation are intrinsically low noise and vibration. No complaints have been received. New processes are assessed for noise or vibration prior to commencement. There has been no requirement to report.</p> <p>There have been no issues relating to noise in 2022. A noise, odour and releases to air risk assessment was conducted January 2022. No non-conformances found</p>	<p>No action</p>
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<p>4.3 NOTIFICATIONS</p>	<p>4.3.1 In the event</p> <p>a) That the operation of the activities give rise to an incident or accident that significantly affects or may significantly affect the environment, the operator must immediately:</p> <p>(i) Inform the Environment Agency (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and (iii) take the measures necessary to prevent further incidents or accidents.</p> <p>b) Of a breach of any permit condition the operator must immediately:</p> <p>(i) Inform the Environment Agency, and (ii) Take the measure necessary to ensure that compliance is restored within the shortest possible time</p> <p>c) Of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.</p> <p>4.3.2 Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.</p> <p>4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.</p> <p>4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:</p> <p>a) Where the operator is a registered company:</p> <ul style="list-style-type: none"> • any change in the operator's trading name, registered name or registered office address; and • any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up. <p>b) Where the operator is a corporate body other than a registered company:</p> <ul style="list-style-type: none"> • any change in the operator's name or address; and • any steps taken with a view to the dissolution of the operator. 	<p>Condition met Compliance inspection by Rhodri Morgan July 2022</p> <p>B1 Action 39872/2: Implement a procedure to ensure the concrete sump is suitably maintained. Evacuating the sump and will inspect weekly.</p> <p>D1 Action 39872/3: Ensure the gates to the rear yard are locked when not in use to prevent unauthorised access. Have told staff and it is currently being implemented (sign being put up today)</p> <p>C4 Action 39872/5: Explore alternative measures of disposal for the stockpiled wastewater until the wastewater treatment plant is operational. Decided to pay for disposal to create space and ease the waste burden. Obtaining quotes as I write.</p> <p>C4 Action 39872/6: Ensure all effluent stored outside of the designated effluent tank is positioned upon the impermeable concrete pad which drains to the concrete sump. All IBC's have been relocated to the concrete slab that holds the water system.</p> <p>C4 Action 39872/7: Remove the wastewater from the damaged containers during the next wastewater disposal run. The damaged 25-litr drums have been disposed of. Any damaged IBC's will go in the next collection as priority.</p> <p>C4 Action 39872/8: Source and position a suitable spill kit within the rear yard. Will order (probably a 1mt bag of sand)</p> <p>C4 Action 39872/9: Take actions to bring the site back in to compliance with the permit. As a minimum, measures to prevent and minimise, leakage and spillage from the containers stored without secondary containment should be implemented. Noted & working towards this.</p>	<p>Actions complete</p>
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	<p>c) In any other case:</p> <ul style="list-style-type: none"> • the death of any of the named operators (where the operator consists of more than one named individual); • any change in the operator's name(s) or address(es); and • any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership. 		
	<p>4.3.5 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:</p> <p>a) a decision by the Secretary of State not to re-certify the agreement;</p> <p>b) (b) a decision by either the operator or the Secretary of State to terminate the agreement; and</p> <p>(c) any subsequent decision by the Secretary of State to re-certify such an agreement.</p> <p><i>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:</i></p> <ul style="list-style-type: none"> ○ Prosecution ○ Formal Caution ○ Suspension Notice ○ Enforcement Notice relating to an actual or potential environment incident <p><i>(All under PPC or the equivalent under previous environmental regimes).</i></p>	Not applicable	No action
FINDINGS FROM LAST CAR INSPECTION	Reported above		No action

Signed



Date 13/02/2023