

Compliance Assessment Report CAR_NRW0041051

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: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual Reports

NRW Lead Officer: Mostyn Wall.

Report sent to: Emma Manning, Safety, Health and Environmental Manager on 10/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	4.2.2
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
C2 - General Management - Management system and operating procedures	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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	0.1

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
G4	Purolite to update EMS to ensure that annual reporting to NRW is completed by the 31 of January	28/02/2023
C2	Purolite to report back the reasons behind the discrepancy	28/02/2023

Criteria	Action needed	Complete by
	between the input and output materials. Why is the waste disposal and/or recovery so high at 22,623.49 tonnes.	
G1	Report back findings of the query with Welsh Water about water usage.	28/02/2023
G1	Purolite to update the EMS to include notification to undertake annual emissions to air monitoring and submission of the reporting to air form to NRW before the deadline.	28/02/2023

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

Purolite annual reports 2022

Purolite submitted annual reporting forms on the 1.02.2023. The deadline for submission is the 31.01. The late submission is a minor non-compliance of permit condition 4.2.2 and is scored a category 4 non-compliance.

Action: Update EMS to ensure that annual reporting to NRW is completed by the 31 of January.

Energy & Water Usage and Performance Parameters 2022

Purolite used a total of 3141.07 MWh of energy in 2022. Purolites new office building has been fitted with solar panels and ground source heat pumps.

In 2022 Purolite has identified a discrepancy between the input and output of materials when comparing the water and raw materials vs the waste & products produced. A similar discrepancy was reported in 2021.

Action. Purolite to report back the reasons behind the discrepancy between the input and output materials. Why is the waste disposal and/or recovery so high at 22,623.49 tonnes.

In 2022 Purolite used 847.42 tonnes of raw materials.

In 2022 the waste disposal and/or recovery was 22,623.49 tonnes.

In 2022 Purolite used 34,835 m³ of water with a specific usage of 1,548 m³ calculated with 22.5 tonnes of unit output. This is a marked increase compared to the 2021 usage where 10,950 m³ of water was used with a specific usage of 329 m³/unit (33.3 tonnes produced in

2021).

Purolite are also liaising with Welsh Water to query their water usage.

Action: Report back findings of the query with Welsh Water.

Annual Emissions Reporting

Under permit condition 4.2.3 Purolite are required to submit reports of the monitoring requirements listed in schedule 3 table S3.1 and schedule 4 table S4.1. The reporting form to air was sent to Purolite with the updated permit on 6/12/2022.

Purolite have not submitted the reporting form to NRW.

Non-submission of the reporting form and emissions monitoring is considered a minor non-compliance. However, Bromine monitoring and modelling was undertaken in 2022 as part of the permit variation process. NRW expects Purolite to undertake annual monitoring of Bromine in 2023 and to submit the correct reporting form.

Action. Purolite to update the EMS to include notification to undertake annual emissions to air monitoring and submission of the reporting to air form to NRW before the deadline.

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 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.