

TWO YEARLY REVIEW OF THE

“SITE PROTECTION AND MONITORING PROGRAMME”



September 2023

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Summary

The following inspection regime is implemented:

Inspection item	Current inspection regime		
	Specific item	Time interval	Carried out by
Tanks	Tanks containing hazardous substances	12 months	Contractor
	All other tanks.	24 months	Contractor
Pipelines	Pipelines transferring caustic, sulphuric acid, steam and compressed air	6 months	Contractor
	All other pipelines.	24 months	Contractor
Bunds	-	6 months	In-house
Road surfaces	-	6 months	In-house
Grease interceptors	Surface water drains in yard and car park	24 months	Contractor

All inspections, as listed in the above table, were carried out. No concerns were raised by the contractor / VCL employee. As the result of many years of inspections without any major concerns, the fact that all tanks are bunded and double bunded and taking into account the likelihood of a pollution incident occurring (assessed in the aspect register), it is decided to reduce the frequency for tank inspections to 12 and 24 months for hazardous substances and non-hazardous substances respectively. All other monitoring frequencies will remain the same.

A preventative maintenance system is in place and is managed by the company's Engineering Department.

1. Introduction

The review of the Site Protection and Monitoring Program has been prepared by:

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1.1 Site Location

Viscose Closures Ltd manufactures seals for bottles/food containers (decorative shrink labels tamper evident seals and pilfer proof closures) at their site in Swansea and sells to customers around the world. Additionally, the companies also import plastic caps, plastic sports caps, aluminum caps, metal crowns, PVC and Poly laminate capsules and Wire Hoods for the home and export market. A one-stop consultancy service is provided in designing capsule, metal caps, sleeving solutions including artwork, sample mock ups, packaging and application machinery.

Viscose Closures Ltd operates a part A (issued by Natural Resources Wales) and a part B (issued by the City and County of Swansea) prescribed process, both with an EPR permit i.e. **VP3635SY** and **Viscose v_2016**. Additionally, the company has also been issued with a conditional consent to the discharge of trade effluent to the public sewer under the Water Industry Act 1999 from the local trade effluent company (Dwr Cymru or Welsh Water) i.e. **Viscose V201/16, version 1**.

1.2 Location and Neighbouring environmentally sensitive areas

The manufacturing site is located at 22 Ferryboat Close, Enterprise Park, and Swansea, SA6 8QN. The centre of the site is at National Grid Reference SS 67397 97192. The site covers an area of 0.78Ha.

The factory is situated at Ferryboat Close on the Swansea Enterprise Park and surrounded by other industrial units. The site is flat and located on a flood plane of the River Tawe which is within 150 metres of the site. The unit in Cynon Close, to the east of the site, are 3 to 4 metres lower than the site. This change in level follows the line of the old railway line that ran through the site. The site has had many uses prior to the formation of the Enterprise Park, formally industrial land that has been reclaimed and redeveloped.

Environmentally sensitive surface water features in the vicinity of the site are:

- River Tawe
- Nant-y-Fendrod
- Fendrod Lake

2. Monitoring Programme (MP)

2.1 Objectives of the Monitoring Programme

No modifications to the objectives of the Infrastructure Monitoring Programme for the installation are requested or necessary.

No changes to operational constraints were introduced or errors in the original CSM were identified.

2.2 Monitoring Programme

Exemption to section 3.1.4 of the permit was granted by Natural Resources Wales for the following reasons:

- The activities performed at the installation have a very low impact on ground and/or groundwater
- The installation is built on a site previously occupied by a scrap yard and copper smelter and existing borehole samples have revealed that the ground is heavily contaminated and a baseline cannot be set
- A conceptual site report was submitted and on grounds explained within this report, the NRW and approved the exemption

2.3 Infrastructure Monitoring Programme

The IMP meets the objectives identified within Section 3.2 of the permit.

2.3.1 Personnel Issues

Personnel responsible for the inspection, testing and maintenance of the pollution prevention infrastructure have appropriate knowledge and experience to ensure compliance with the monitoring programme. Training records are available on request.

2.4 Assessment and Reporting Procedures

2.4.1 Assessment Procedure

Overall responsibility of the SPMP lies with the HSEQ Manager. All inspection records and summaries in relation to the SPMP are kept for a minimum of 5 years. Any corrective action required are discussed in consultation with the Head of Operations, Assistant Head of Operations, the Engineering Department and the HSEQ Manager. If necessary, financial approval from the company Board is obtained. In addition, if required, notification of engineering work will be sent to Natural Resources Wales.

2.4.2 Reporting Procedure

The Operator shall implement and maintain the SPMP submitted under the permit condition and shall carry out regular reviews of it at a minimum frequency of 2 years. The results of such reviews and any changes made to the SPMP shall be reported to National Resources Wales within 1 month of the review or change.

2.4.3 Data Recording and Data Management

The environmental management is integrated within the company's Integrated Management System (IMS) and provides the basis for data monitoring, data recording and data management. Viscose Closures Ltd operates an active and accredited IMS (ISO9001, ISO14001, ISO45001, BRCGS Packaging and Packaging Materials).

3. Other Issues

Since June 2019 the company utilise the services of an approved and specialist contractor to perform tank and pipeline inspections, based on visuals and wall thickness measurements. Going forward, this service is to be used for the 6, 12 and 24 monthly tank and pipeline inspection.

In addition, grease interceptors and sump cleaning is carried out by an approved and specialist contractor.

4. References

None specified.

5. Abbreviations used

Bund	Structure surrounding a storage facility providing containment of a chemical at times of spillages, leakages and /or loss of integrity of storage facility
CSM	Conceptual Site Monitoring
EMS	Environmental Management System
HSEQ	Health, Safety, Environment and Quality
IMP	Infrastructure Monitoring Programme
SPMP	Site Protection and Monitoring Programme