

Compliance Assessment Report CAR_NRW0043988

Permit being assessed: BV4223IE.

For: Llanelli Plant , **held by:** Huntsman Corporation (UK) Ltd

At: LLANELLI PLANT BYNEA , LLANELLI, LLANELLI, DYFED, SA14 9TE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 28/03/2024 between 10:00 and 13:30.

Parts of permit assessed: See Summary, Compliance Criteria Assessed.

NRW Lead Officer: Elliot Jones, accompanied by Andi Kemp.

Report sent to: Joshua King , EHS Manager, on 09/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

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

Huntsman Site Visit

Purpose of Compliance Assessment Report

- Review of a site visit undertaken on 28th March 2024.

Attendees

Elliot Jones- Senior Officer Industry Regulation
Andi Kemp – Lead Specialist Industry Regulation
Mark Dixon- HSE COMAH Interventions Manager
Joshua King- Huntsman EHS Manager
Dan Price – Huntsman Engineering Manager

This Compliance Assessment Report was completed following a site visit undertaken by Elliot Jones on the 28th March 2024 accompanied by Andi Kemp. Elliot Jones has recently been assigned the regulatory officer for Huntsman Limited installation based in Bynea and will be regulating all Environmental Permitting Regulation (EPR) matters going forward on behalf of Natural Resources Wales. The main purpose of the site visit was to provide Elliot Jones with a process overview of site operations and to meet the technical team at Huntsman Limited. The visit coincided with the visit of Andi Kemp, attending for COMAH purposes.

Process Overview- Site tour

Underwent a site induction on arrival by video and short quiz. Operator presented an overview of the site via PowerPoint presentation explaining the process, types of raw material and products produced on site and recent construction projects the site has undertaken.

The operator provided NRW officers with a comprehensive process overview covering all aspects of plant operations, accompanied by Joshua King and Dan Price. This included observation of product and raw material storage tanks across the site. Storage tanks are fitted with fill level alarms and are regularly checked by operators on a midnight walk around, comparing recorded levels with expected levels kept in the control room. Site utilises a kerbed bunding system with a closed central spine drain, discharging to the effluent plant should leak occur from tanks or spillages. Operator indicated that seals within the bunding system to be renewed in coming months, along with painting of tanks and ductwork.

Operator explained how strong and weak effluent are handled independently of one another. Weak effluent typically 98% water 2% Amine, stored in an open to atmosphere tank and then filtered by reed bed prior to discharged to the Loughor estuary, and the strong effluent typically 90% water 10% amines is incinerated on site.

Weak effluent bunded system has recently had a volatile organic compounds (VOC) alarm installed allowing for closer monitoring of VOC concentration in effluent and for early indication of sudden changes in VOC levels. Bio filtration reed bed viewed.

Strong effluent incinerator and continuous monitoring system (CEMs) viewed. Incinerator has a visual

control panel in contained room nearby, allowing operator to closely monitor deviations in the incinerator's performance parameters. Despite this the control panel is not capable of altering the incinerator settings, this is carried out solely by the central control room.

During site tour operator and officers attended a high vantage point to achieve a view of the site to understand the magnitude and complexity of the site. Whilst undertaking the site tour, general house keeping seen to be excellent.

Conclusion

Following an introductory meeting and a detailed site tour officer has achieved a greater understanding of Huntsman's working procedure and the complexities of a COMAH site. Officer observed effluent treatment and processing. Deemed a positive visit and has allowed officer to relate permit requirements to actual site activities.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.