

Compliance Assessment Report CAR_NRW0044087

Permit being assessed: BU2110IS.

For: Barry Site EPR/BU2110IS, **held by:** Cabot Carbon Ltd

At: Barry Site Sully Moors Road , Sully, Penarth, Vale of Glamorgan, CF64 5RP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 26/03/2024 between 10:00 and 13:00.

Parts of permit assessed: All.

NRW Lead Officer: Brigid Armstead, accompanied by Mostyn Wall, Geraint Harris.

Report sent to: Sian Llewellyn, Quality & Environmental Manager, on 23/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	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

A site visit took place on 26th March 2024 with NRW Officers Mostyn Wall and Brigid Armstead visiting Sian Llewellyn at the Cabot Carbon site in Barry. The purpose of this visit was to discuss hand regulation of the site under EPR from Mostyn Wall to Brigid Armstead. This meeting and inspection served as an introduction to the site and an overview of site operations, management and site layout. This physical inspection was limited to just a familiarisation and did not look in detail at the technical processes, goods and waste movements, physical infrastructure or drainage systems.

The internal and external areas of the site were viewed through a walking tour and found to be well organised.

Fugitive Emissions:

Cabot submitted a Fugitive Emissions report for 2023 in support of reporting requirements under permit requirement 4.1.4. The report addresses fugitive emissions from the installation to air, water and to land.

In 2023 there were 59 releases recorded across 8 media categories, which is an increase over last year. However, all but one of the releases in 2023 were very small, under 20Kgs. This resulted in the total amount of releases coming to 293Kgs which is a significant reduction on last year (546Kgs). Most spills and leaks were released to indoor areas or to small bund/containment thereby posing no pollution risk.

The most significant release in 2023 was due to a fault with a Boiler feed water dosing pump. A leak on the discharge tubing meant the chemical treatment agent had pumped out into the bund of the dosing hut. The release was estimated to be ~150L with all the released material being contained within the storage bund.

Cabot continued to focus on mechanical integrity programmes and risks of corrosion under insulation. Reliability improvements implemented in 2023, with some £2 million in capital expenditure during the year, included projects such as:

- Cooling tube replacement.
- Glycol condenser replacement
- Filter life extension
- Site radio system upgrade
- PTFE pipework renewal in the acid area

Cabot are committed to continuously improving our Environmental performance, during 2024 we plan to continue our focus on reliability improvements through capital expenditure with another £2 Million budgeted for sustaining capital.

Fugitive Release Breakdown

2023	Quantity KG	No. Fugitive Releases	
Ammonia	0	1	Gas
Fumed Silica	86.3	29	Solid
Hydrogen	0.1	1	Gas
Oil (Non Feedstock)	10.3	10	Liquid
Sodium Hydroxide	0.5	1	Liquid
AHCl	12.1	4	Gas
Suez	157.2	5	Liquid
HCl	26.1	8	Liquid
Total	293	59	

NRW Received the Q1 January-March 2024 emission reports on the 19/04/2024.

The emissions from A1 are compliant with the permit.

Reporting of Emissions to Air for Carbon Monoxide for the period 1 January 2024 to 31 March 2024

Emission Point	Substance / Parameter	Emission Limit Value [6]	Result ^{[1][7]} [Note A]	Test Method [2]	Sample Date and Times [3]	Accreditation/Certification [4]	Uncertainty +/- [5]
A1	Carbon monoxide	3500 mg/m ³	1227 mg/m ³	TGN M22	28.02.24 09:50-10:50, 10:51-11:51, 11:52-12:52	MCERTS / UKAS	+/- 55.75 mg/m ³

Emission Point	Substance / Parameter	Emission Limit Value [6]	Result ^{[1][7]} [Note A]	Test Method [2]	Sample Date and Times [3] [7]	Accreditation/Certification [4]	Uncertainty +/- [5]
A1	Chlorine	10mg/m ³ [8]	0.94 mg/m ³	US EPA Method 26A	28.02.24 09:50-10:20, 10:25-10:55, 11:00-11:30, 11:35-12:05, 12:10-12:40	MCERTS / UKAS	+/- 0.28 mg/m ³
A1	Chloromethanes (as methyl chloride)	50mg/m ³	10.18 mg/m ³	BS EN 13649	28.02.24 09:50-10:50, 10:55-11:52, 11:55-12:55	MCERTS / UKAS	+/- 1.85 mg/m ³
A1	Hydrogen chloride	10mg/m ³	0.67 mg/m ³	TGN M22	28.02.24 09:50-10:50, 10:51-11:51, 11:52-12:52	MCERTS / UKAS	+/- 0.05 mg/m ³

Emissions to water, W1, W2 & W3 are compliant with the permit.

Reporting of Emissions to Water (other than to Sewer) for the period from 1 January 2024 to 31 March 2024

Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/ Certification ^[4]	Uncertainty ^[5]
W1	Oil and grease	5mg/l ^[6]	<0.713	IR Spectrometry - EA Test 362 ISBN 0117517283	12.03.24 @06:30hrs	UKAS	+/- 20.0%
	BOD ₅	20mg/l ^[6]	2	ISBN 011 7522120	12.03.24 @06:30hrs	UKAS	+/- 23.6%
	pH	>5, <9 ^[7]	7.2	BS 6068-2.50:1995	12.03.24 @06:30hrs	UKAS	+/- 20.3%
W2	Oil and grease	5mg/l ^[6]	<0.60	IR Spectrometry - EA Test 362 ISBN 0117517283	12.03.24 @06:34hrs	UKAS	+/- 20.0%
	BOD ₅	20mg/l ^[6]	<1	ISBN 011 7522120	12.03.24 @06:34hrs	UKAS	+/- 23.6%
	pH	>5, <9 ^[7]	7.7	BS 6068-2.50:1995	12.03.24 @06:34hrs	UKAS	+/- 20.3%
W3	Oil and grease	5mg/l ^[6]	<0.60	IR Spectrometry - EA Test 362 ISBN 0117517283	12.03.24 @06:40hrs	UKAS	+/- 20.0%
	BOD ₅	20mg/l ^[6]	<1	ISBN 011 7522120	12.03.24 @06:40hrs	UKAS	+/- 23.6%
	pH	>5, <9 ^[7]	7.7	BS 6068-2.50:1995	12.03.24 @06:40hrs	UKAS	+/- 20.3%

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.

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.