

Compliance Assessment Report CAR_NRW0046030

Permit being assessed: MP3431SP.

For: Barry Aluminium Chlorohydrate Plant EA/EPR/MP3431SP/V002, **held by:** Alembic Manufacturing Ltd

At: Unit 6 Wimbourne Buildings , Atlantic Way, Barry Docks, Barry, Vale of Glamorgan, CF63 3RA.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Annual Returns 2024.

NRW Lead Officer: Brigid Armstead.

Report sent to: David Randall, Director, on 24/01/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	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

Reporting of compliance with Low Impact Installation criteria (Form L1) for 2024 received by NRW on 23/01/2025. This has been reviewed and accepted.

Water Usage

The table below provides an overview of annual water usage per year since 2016.

Year	Discharge (m3/day)	Liquid Produced (tonnes)	Water as product (tonne)	Water usage (m3)	Discharge Volume (tonnes)	Discharge as a percentage of usage (%)	Discharge volume per unit of product (m3/tonne)
2016	8.8	8759	4993	8235	3242	39	0.37
2017	9.6	7029	4007	7498	3491	47	0.50
2018	5.5	8856	5048	7067	2019	29	0.23
2019	8.2	3719	4055	6718	2999	45	0.81
2020	5.8	3047	3047	5157	2111	41	0.69
2021	5.4	4055	3719	6055	2000	33	0.49
2022	7.33	6534	3724	6398	2674	42	0.41
2023	8.4	7636	4353	7419	3066	41	0.40
2024	9.7	6537	3726	7272	3546	49	0.54

To allow water efficiency to be compared year on year the discharge is calculated as a percentage of the billed water used at the installation and a further comparison as discharge volume per unit of product. The trend appears to be to a reduced water efficiency, while fluctuations in trend may be a result of the unquantifiable water lost due to evaporation. The discharge volume per unit of product has increased and we would like to see this trend reversed.

Please investigate this loss of water efficiency. We will continue to monitor and may require that further action is taken if this does not improve in future reports.

Waste Generation

The table below provides an overview of the sites reported waste since 2019.

Year	Office Packaging	Granular Waste / Filter	Total Waste /	Total Liquid Produced	Waste Produced per
------	------------------	-------------------------	---------------	-----------------------	--------------------

	Waste (tonnes)	waste (tonnes)	(tonnes)	(tonnes)	unit of product (tonnes)
2019	16	13.92	43.74	6524	0.0067
2020	16	13.84	29.82	5346	0.0056
2021	9.94	27.74	23.86	7114	0.0034
2022	11.094	27.54	38.63	6534	0.0059
2023	11.09	28.02	39.11	7636	0.0051
2024	9.64	13.46	23.1	6537	0.0035

Waste per unit of product appears to have been reducing for the last two years. it's appreciated that some fluctuations are caused due to the cycle of waste filters, which can be either one or two consignments within a year.

Electrical Usage

The Table below provides an overview of the electrical usage since 2019.

Year	KWh	Total Liquid Produced / Tonnes	KWh Per Tonne of product
2019	71937	6524	11.0
2020	71333	5346	13.3
2021	80395	7114	11.3
2022	80182	6534	12.3
2023	72265	7636	9.5
2024	49,810	6537	7.6

There appears to be an increase in energy efficiency in terms of KWh per tonne of product produced, with 2024 appearing the most efficient year since 2019.

No changes in chemical inventory or quantities reported by site, and inventory still meets the <5% COMAH limit for the LLI criteria.

There were no reported incidents or any releases of substances in 2023 nor any fugitive emissions.

All low impact installation criteria have been met.

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.