

Compliance Assessment Report CAR_NRW0046224

Permit being assessed: BW0886IZ.

For: Milford Haven Ceramics EPR/BW0886IZ, **held by:** CBL Ceramics

At: Milford Haven Ceramics Marble Hall Road , Steynton, MILFORD HAVEN, Dyfed, SA73 2PP.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 2024 Annual Monitoring Returns.

NRW Lead Officer: Daren Pike.

Report sent to: Barbara A Abeles , Managing Director, on 11/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR4B - Installations - Information - Reporting	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**Introduction**

This Compliance Assessment Report (CAR) has been issued in response to the submission of the 2023 annual monitoring returns by CBL Cermics Ltd (the operator) for activities at Marble Hall Road, Steynton, Milford Haven, Pembrokeshire, SA73 2PP under permit EPR-BW08861Z .

Point Source Emission to Air Parameters (Air 1 Form) as required by condition 4.1.2

The annual submission included results for all parameters required over this period. The reported values for Beryllium and its compounds as Be are in compliance with the permit.

Point Source Emission to Water Parameters (Water 1 Form) as required by condition 4.1.2

The annual submission included results for all parameters required over the period. The reported values for Beryllium and its compounds as Be are in compliance with the permit.

Annual Water/Energy Use, Production & Waste as required by condition 4.1.2

The annual production/treatment data specified in Table S2 were also received and include the reporting parameters specified in the permit.

This CAR was completed on 11 February 2025. However, to ensure that the CCS score is attributed to the correct financial year (for billing) the date on CARS is 31 December 2023.

The Annual return / Report is shown below.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW



PERMIT NUMBER: BW0886IZ

Attention of: Natural Resources Wales

Date: 24/01/2025

Ref: 2024 reporting

Please find attached our 2024 reporting forms:

A1 – Quarterly emissions to Air.

S1 – Quarterly emissions to Sewer.

R1 – Waste disposal and recovery.

2.7.1 – Review of Energy Consumption.

E1 – Energy usage.

WU1 – Water usage.

4.1.4 – Review of Fugitive Emissions.

Best Regards

P. Nash

CC: BA Abeles

Permit Reference Number : BW0886IZ

Operator : CBL Ceramics Limited

Installation : Milford Haven Ceramics

Form Number : R1

Reporting of Waste Disposal and Recovery for the year2024.....

Waste Disposal & Recovery			
Waste Description	Disposal		Recovery
	Route	Tonnes	Tonnes
1) Total Hazardous Wastes	Landfill	12.39	
2) Total Non-Hazardous Wastes	Landfill	12.86	
TOTAL WASTE		25.25	

Trends in Waste Disposal and Recovery	
Year	Parameter
2015	25.16 Tonnes
2016	33.93 Tonnes
2017	25.39 Tonnes
2018	27.22 Tonnes
2019	36.50 Tonnes
2020	22.82 Tonnes
2021	25.29 Tonnes
2022	25.54 Tonnes
2023	26.01 Tonnes
2024	25.25 Tonnes
2025	26.00 Tonnes

Operator's comments :

SignedP Nash.....
(authorised to sign as representative of the Operator)

Date.....25/01/2024.....

Date of Form: 01/01/06



MARBLE HALL ROAD MILFORD HAVEN
PEMBROKESHIRE SA73 2PP WALES UK
Phone: 01646 697681 Fax: 01646 690053

2.7.1 Review of Energy Consumption 2024

Energy used 2024

Electricity – 691 Mwh

Gas – 510 Mwh

Total Energy 1200 Mwh

Number of production units produced in 2024: 430911
Production units produced 430911 ÷ Energy used 1200 Mwh
= 359 production units produced per 1 Mwh energy used

Notes:

A/ Purchased and installed 2 x new high efficiency furnaces. All electric kilns are only used when full to capacity. Have added three more high efficiency furnaces replacing old ones.

B/ High Efficiency Lighting have been fitted throughout the site. Since all work is done by CBL personnel, this has been a phased-in plan to replace all lighting. We continue to upgrade with state of the art LED lighting.

C/ Inverter Drives soft start were fitted to the main vokes filter bank, print room extract and air-conditioning, the ball mills, and fume cupboard in cleaning department to reduce the demand of the hard start-up.

D/ All extract systems shut down at end of work day; but also have the capability to run the main vokes filter bank at 50% level if we do require, on limited occasions, to run overnight.

E/ All boilers and heating are serviced annually and are all fitted with timers and thermostats. A new hot water storage system has been installed on the shower room boiler.

F/ External lighting is motion detector activated or on adjustable timers. These have also been upgraded to LED lighting.

G/ Whenever possible, instead of running overtime on weekends we add personnel to work extra hours during weekday shift time.

H/ All computer/fax/printer hardware are shut down at the end of each day.

I/ Fully decommissioned old equipment is replaced with highly efficient state-of-the-art equipment. This continues throughout the plant as needed and desirable.

J/ New nitrogen generating plant has been purchased and installed to replace delivered liquid nitrogen.

K/ New high efficiency compressor installed 23/1/24

L/ Installation of new high efficiency boiler system for heating the Main Office Block: 8/24.

Signed ...P Nash.....

Date ...25/01/25.....



MARBLE HALL ROAD
MILFORD HAVEN, PEMBROKESHIRE. SA73 2PP, WALES, UK
Phone: 01646 697681 Fax: 01646 690053

4.1.4 Review Of Fugitive Emissions 2024

Daily maintenance is carried out on each piece of equipment that has been utilized during shift by the individual operators. Most equipment is covered by preventive maintenance and emergency service contracts. Annually, the plant is closed for a week of major maintenance, repair and/or upgrade servicing. All plant equipment is linked into the trade effluent system. All effort minimizes or eliminates any risk to groundwater

CBL uses quite small quantities, as detailed below,

a) Organic Solvents

Chemical:	Dept used:	Quantity per annum:
Industrial Meths	Hot pressing	1575 litres (as liquid)
Butanone	Ceramic cleaning	30 litres (as liquid)
Xylene	Metallisation	0.4 litres (as liquid)
Isopropanol	Hot pressing	15 litres (as liquid)
Glycol-ether	Metallisation	0.10 litres (liquid)

All of these solvents are vented through the exhaust systems to air.

b) Inorganics

Chemical:	Dept used:	Quantity per annum:
Ammonia	Powder processing	7.8 litres as (liquid)

All of the Ammonia is vented through the Powder Processing exhaust system to air.

c) Gases

Chemical:	Dept used:	Quantity per annum:
Natural gas : methane	5 gas boilers/heaters	510 MWh consumed
Hydrogen	Metallisation	58080 litres of gas

All of the Hydrogen is vented to air.

SignedP Nash.....

Date25/01/25

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited
 Installation : Milford Haven Ceramics Form Number : A1
 Reporting of Emissions to Air for the period from ...01/01/2024.....to...31/03/2024.....

Emissions to Air							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
A1	Beryllium and its compounds as Be	0.001 mg/m ³ ^[6]	<0.001	IN-HOUSE	26/02/24 07.50am to 14.55pm	IN-HOUSE	25%

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
 [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. gas chromatography.
 [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
 [4] The accreditation status of the equipment and/or the monitoring organisation, as appropriate, for the methods used for both sampling and analysis.
 [5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) - (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)
 [6] The emission limit value for beryllium and its compounds is expressed as a maximum individual value and corrected to 273K, 101.3kPa.

SignedP Nash..... Date.....25/01/25.....
 (authorised to sign as representative of the Operator)

Date of Form: 01/07/08

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited
 Installation : Milford Haven Ceramics Form Number : S1
 Reporting of Emissions to Sewer for the period from ...01/01/2024.....to...31/03/2024.....

Emissions to Sewer							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
S1	Beryllium and its compounds as Be	5 mg/l ^[6]	0.21 mg/l	AAS	14.13pm 29/02/24	UKAS	1%
S1	Chemical Oxygen Demand	No limit applies	632 mg/l	*AS BELOW	14.13pm 29/02/24	UKAS	10%

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
 [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. colorimetry.
 [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements, or flow/time proportional samples, the percentage of the process operating time covered by the monitoring is given.
 [4] The accreditation status of the equipment and/or the monitoring organisation, as appropriate, for the methods used for both sampling and analysis.
 [5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) - (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)
 [6] The emission limit values for beryllium and its compounds, cadmium and its compounds, and mercury and its compounds are expressed as a maximum individual value.
 [7] The emission limit values for cadmium and its compounds and mercury and its compounds are expressed as a maximum annual value.

SignedP.Nash..... Date.....25/01/25.....
 (authorised to sign as representative of the Operator)

* CHEMICAL OXYGEN DEMAND TEST METHOD: OXIDATION WITH CHROMIC ACID

Date of Form: 01/01/06

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited

Installation : Milford Haven Ceramics Form Number : A1

Reporting of Emissions to Air for the period from ...01/04/2024.....to...30/06/2024.....

Emissions to Air							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
A1	Beryllium and its compounds as Be	0.001 mg/m ³ ^[6]	<0.001	IN-HOUSE	29/04/24 07.50am to 14.55pm	IN-HOUSE	25%

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The accreditation status of the equipment and/or the monitoring organisation, as appropriate, for the methods used for both sampling and analysis.

[5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) – (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)

[6] The emission limit value for beryllium and its compounds is expressed as a maximum individual value and corrected to 273K, 101.3kPa.

SignedP.Nash..... Date.....25/01/25.....
(authorised to sign as representative of the Operator)

Date of Form: 01/07/08

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited

Installation : Milford Haven Ceramics Form Number : S1

Reporting of Emissions to Sewer for the period from ...01/04/2024.....to...30/06/2024...

Emissions to Sewer							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
S1	Beryllium and its compounds as Be	5 mg/l ^[6]	0.31 mg/l	AAS	12.45pm 15/05/24	UKAS	1%
S1	Chemical Oxygen Demand	No limit applies	170 mg/l	*AS BELOW	12.45pm 15/05/24	UKAS	10%

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. colorimetry.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements, or flow/time proportional samples, the percentage of the process operating time covered by the monitoring is given.

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[5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) – (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)

[6] The emission limit values for beryllium and its compounds, cadmium and its compounds, and mercury and its compounds are expressed as a maximum individual value.

[7] The emission limit values for cadmium and its compounds and mercury and its compounds are expressed as a maximum annual value.

SignedP.Nash..... Date.....25/01/25.....
(authorised to sign as representative of the Operator)

* CHEMICAL OXYGEN DEMAND TEST METHOD: OXIDATION WITH CHROMIC ACID

Date of Form: 01/01/06

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited

Installation : Milford Haven Ceramics Form Number : A1

Reporting of Emissions to Air for the period from ...01/07/2024.....to...30/09/2024.....

Emissions to Air							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
A1	Beryllium and its compounds as Be	0.001 mg/m ³ ^[6]	<0.001	IN-HOUSE	24/09/24 07.55am to 15.05pm	IN-HOUSE	25%

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
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- [5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) - (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)
- [6] The emission limit value for beryllium and its compounds is expressed as a maximum individual value and corrected to 273K, 101.3kPa.

SignedP Nash..... Date.....25/01/25.....
(authorised to sign as representative of the Operator)

Date of Form: 01/07/08

Permit Reference Number : BW0886IZ Operator : CBL Ceramics Limited

Installation : Milford Haven Ceramics Form Number : S1

Reporting of Emissions to Sewer for the period from ...01/07/2024.....to...30/09/2024...

Emissions to Sewer							
Emission Point	Substance / Parameter	Emission Limit Value	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Accreditation/Certification ^[4]	Uncertainty ^[5]
S1	Beryllium and its compounds as Be	5 mg/l ^[6]	0.27 mg/l	AAS	11.52am 6/09/24	UKAS	1%
S1	Chemical Oxygen Demand	No limit applies	2103 mg/l	*AS BELOW	11.52am 6/09/24	UKAS	10%

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum - maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, e.g. colorimetry.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements, or flow/time proportional samples, the percentage of the process operating time covered by the monitoring is given.
- [4] The accreditation status of the equipment and/or the monitoring organisation, as appropriate, for the methods used for both sampling and analysis.
- [5] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated. The following uncertainties are quoted on a different basis (basis as stated) - (The basis of any other uncertainty figure needs to be stated. Where no figure is available the Agency will need to agree an appropriate uncertainty value.)
- [6] The emission limit values for beryllium and its compounds, cadmium and its compounds, and mercury and its compounds are expressed as a maximum individual value.
- [7] The emission limit values for cadmium and its compounds and mercury and its compounds are expressed as a maximum annual value.

SignedP Nash..... Date.....25/01/25.....
(authorised to sign as representative of the Operator)

* CHEMICAL OXYGEN DEMAND TEST METHOD: OXIDATION WITH CHROMIC ACID

Date of Form: 01/01/06

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.