

Compliance Assessment Report CAR_NRW0048117

Permit being assessed: NP3634MU.

For: Celtic Chemicals Limited, **held by:** Celtic Chemicals Limited

At: Celtic Chemicals Units 25-27 , Kenfig Industrial Estate, Margam, Port Talbot, SA13 2PE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 01/04/2025 between 10:00 and 12:00.

Parts of permit assessed: See Section 4.

NRW Lead Officer: Benjamin Taylor.

Report sent to: Finance Director, Celtic Chemicals, on 17/04/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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?

Criteria	Action needed	Complete by
IR3B	Operator is to submit evidence to NRW of the pipework associated with the Mixed Wastewater Tank being rerouted overhead once completed.	30/05/2025

Criteria	Action needed	Complete by
IR1A	Operator is to ensure that the linear drainage channels associated with the IBC storage areas are free of debris at all times, these checks should be incorporated within the scope of the routine inspections if not already.	17/04/2025
IR1A	Operator is to update OP0003-SOI0001 Chemical spillage v2 to detail a written procedure if a spillage incident were to occur on the public highway. The Operator should review potential risks relating to spillages and also include these within their procedure if any are identified.	16/05/2025

Compliance criteria codes are listed in the 'Important information' section below.

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) is regarding the site inspection undertaken by Natural Resources Wales (NRW) to Celtic Chemicals Ltd (EPR/NP3634MU) at their Low Impact Installation (LII) located within Kenfig Industrial Estate.

Scope

This was a pre-arranged visit, the purpose of which was as a familiarisation and introductory visit for the assigned NRW Lead Officer. The visit also provided the opportunity to gain insight into the usage of the newly acquired units, which are located opposite the permitted boundary.

At the request of NRW, after the visit the Operator submitted the following documents via email on the 11th of April 2025:

- Camplas 25000 litre tank.
- DN-175.
- OP0003-REC0006 Emergency response V6.
- OP0003-SOI0001 Chemical spillage v2.

- OP0008 Waste management V5.

Opening Meeting

NRW Officers arrived onsite at 10:00 where they were met with key representatives of Celtic Chemicals Ltd (CCL). The visit began with an opening meeting where CCL provided a general update on the recent performance and key milestones of the installation over 2024. NRW were informed that the recent achievement of ISO 14001 in 2024 has allowed CCL to take more of a proactive approach relating to their environmental performance, with a strive towards continuous improvement.

CCL also provided an update regarding their wastewater management, having cancelled plans to install a dedicated wastewater treatment plant onsite. NRW were informed that there are three main wastewater streams generated by the installations production process, namely:

- Mixed Wastewater Stream.
- Sodium Nitrate Wastewater Stream.
- Lead Wastewater Stream.

The generation of the different wastewater streams is variable and dictated entirely on the production requirements at the time. The installation produces via batch processing which facilitates the segregation of different wastewater streams for disposal. NRW were informed that CCL have recently acquired an integrally bunded storage tank (~25,000 litres capacity), which is being used to store their mixed wastewater stream prior to disposal. Specification details (*Camplas 25000 litre tank*) illustrated that the bund has a ~27500 litre capacity. CCL also advised of their intention to potentially acquire an additional two tanks to collect wastewater from the remaining two wastewater streams; these are currently stored within a number of IBCs within the rear compound. Inductively Coupled Plasma (ICP) analysis is also undertaken onsite to ascertain the composition of the wastewater for disposal purposes, CCL outlined that the main contaminants of concern are metals.

Site Walkover and Observations

A Site Walkover commenced at 10:35, covering both internal and external area. During the visit the following works area were inspected:

- Rear Compound.
- New Units – Internal.
- Main Process Building (MPB) – Internal.



Images 1 and 2: Integrally banded wastewater tank and inlet pipework entering via reception sump (right).

NRW Officers inspected the Mixed Wastewater Tank located within the rear compound of the Site. Effluent arising from the production process collects within a sump adjacent to the rear wall of the MPB (*Image 2*), from here effluent is pumped to the storage tank or IBCs depending on the wastewater stream that is generated at the time. NRW Officers noted that the connecting pipework ran along the ground between the tank and the sump, whilst this presented a potential trip hazard to site users there is also considered the risk of the pipe becoming uncoupled which would result in the potential release of contaminated liquid. CCL representatives outlined their plans to run this pipework overhead in order to mitigate these risks in the future. It was welcome to see that the valve associated with the coupling point was locked to prevent unauthorised usage.

Action:

Operator is to submit evidence to NRW of the pipework associated with the Mixed Wastewater Tank being rerouted overhead once completed.



Image 3: Surface water sump associated with the drainage infrastructure of the Rear Compound.

The surface water sump (located in the north-eastern corner of the compound) is fed via a series of linear drainage channels; running along the edges of the concrete compound utilised for wastewater IBC storage. NRW were informed that the sump has a 5,000 litre capacity, and visually inspected twice per week to ensure levels are maintained below the inlet pipework. NRW were informed that structural integrity inspections were not undertaken on the sump, CCL were advised to consider implementing these to minimise the risk of ground contamination should failures in the concrete walls/floor be present. As a contingency measure, two additional tanks were located adjacent to the sump that can be easily transferred to in the event of a spillage. During the inspection, it was noted by NRW Officers that sections of the linear drainage channels contained an accumulation of debris, possibly restricting their flow capability. Given these channels provide containment in the eventuality of a spillage, it is important that these drainage features are flowing freely to prevent them becoming overwhelmed (by a sudden surge of liquid), which ultimately would result in losses to ground.

Action:

Operator is to ensure that the linear drainage channels associated with the IBC storage areas are free of debris at all times, these checks should be incorporated within the scope of the routine inspections if not already.

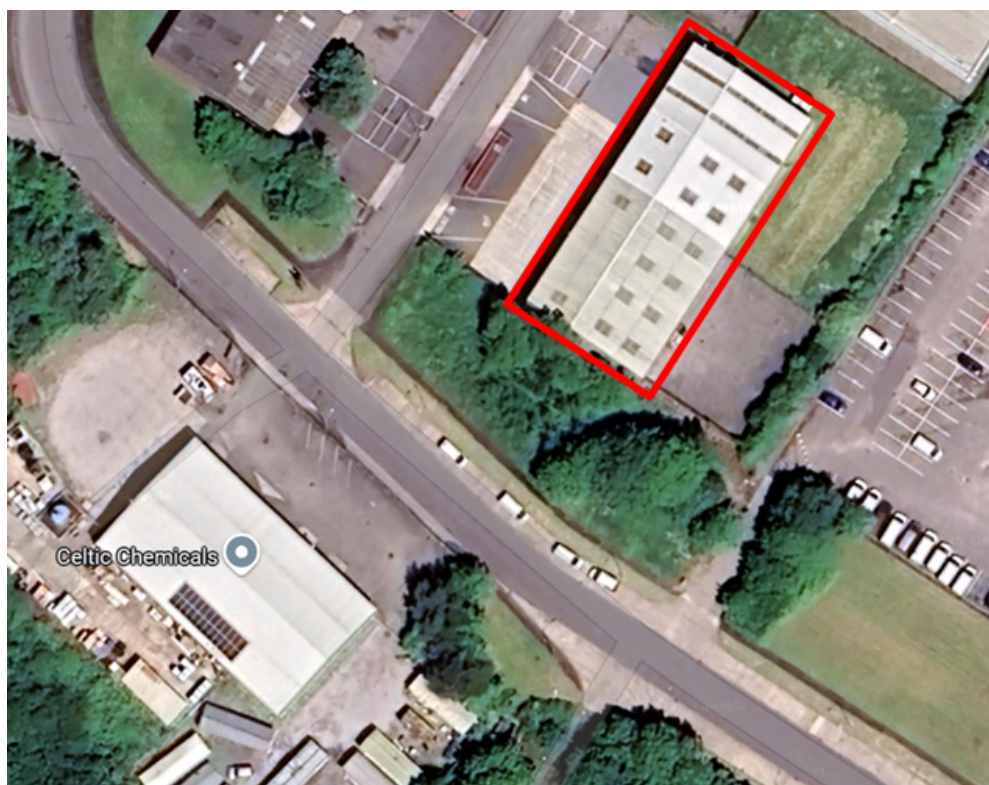


Image 4: Location of newly acquired units (highlighted in red)

NRW Officers then attended the newly acquired units, which are situated adjacent to the MPB on the opposite side of a public highway. The new units are primarily utilised as warehouse storage space (both goods in and out) however, an aspect of the production process namely blending is also undertaken within a small section (northwestern corner). The Operator has been made aware both during the visit and within CAR_NRW0046397 that a permit variation is required to incorporate these units into their permitted Site boundary. There were internal no drainage features identified within the warehouses which may provide a potential pathway for rapid migration of contaminants in the eventuality of an internal spillage. However, NRW were informed of a reliance on forklift movements to transport products and materials across the public highway between the MPB and Warehouses/Blending Area. NRW considers there to be a potential risk of an accidental spillage i.e. from uneven road surface, third-party vehicles occurring as a result of these frequent forklift movements across the public highway and requested CCL's spill response procedure (*OP0003-SOI0001 Chemical spillage v2* and *OP0003-REC0006 Emergency response V6*).

Partial review of the submitted spill response procedure (*OP0003-SOI0001 Chemical spillage v2*) appeared to focus primarily on spillages occurring internally, and there was an absence of any written procedure should an incident occur on the public highway. It is considered by NRW that alternative steps i.e., traffic management, protection of drains, etc

would be required were a spillage to incident occur within this location. Surface water road gullies were identified within the vicinity of the likely forklift crossing point providing a potential pathway for rapid migration of contaminants (following a spill). During the visit, the Operator indicated to NRW that these drainage features are routed towards a nearby Dŵr Cymru Welsh Water (DCWW) pumping chamber. However, a review of NRW's DCWW asset map indicate a potential discharge into the Afon Cynffig situated nearby posing a pollution risk to controlled waters. It is noted that Environmental Contamination is included within document referenced *OP0003-REC0006 Emergency response V6*, however, there are no additional procedural details which can be referred to by onsite staff.

Action:

Operator is to update *OP0003-SOI0001 Chemical spillage v2* to detail a written procedure if a spillage incident were to occur on the public highway. The Operator should review potential risks relating to spillages and also include these within their procedure if any are identified.

The walkover concluded with an inspection of the production area located within the MPB. NRW were informed that the production area has increased in size following the acquisition of the new units (on opposite side of public highway), which has allowed for previously stored materials to be relocated. The installation has benefitted from new equipment i.e. ovens which currently occupy the former warehouse space. In addition to production facilities, the onsite laboratory is located within the MPB, here wastewater composition testing, product quality assurance and incoming products are tests are undertaken by technicians. As a precautionary measure, NRW Officers observed kerbing to reduce the risk of forklift collision with IBCs bearing chemicals which are required in the production process. Similarly to the new warehouse units, there were no internal drainage features identified that would allow for the escape of contaminants should a spillage arise. NRW were informed that harmful airborne contaminants are controlled via an extraction system. There are two separate extraction systems controlling both dust (white pipework) and fumes (grey pipework). The dust extraction system is fitted with an air filtration system prior to release to atmosphere, collected dust (from this filtration system) is then disposed of as hazardous waste following composition analysis (as illustrated within *OP0008 Waste management V5*).

The site inspection concluded at 12:00.

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.