

Compliance Assessment Report CAR_NRW0050275

Permit being assessed: YP3930EX.

For: Pembroke Refinery, **held by:** Valero Energy Ltd

At: Valero Energy Ltd , Pembroke Refinery, Pembroke, Pembrokeshire, SA71 5SJ.

Type of assessment: Site Inspection,

Reason: Incident Response (Incident number 2600071).

On: 10/12/2025 between 11:30 and 16:00.

Parts of permit assessed: See below.

NRW Lead Officer: Michael Launder.

Report sent to: Manager Environmental Engineering, Valero Energy Ltd, on 06/01/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	C3 Minor	3.1.1
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(3)	i) Operator to confirm measures taken to recover spilled VGO, including means of waste disposal ii) Operator to submit summary of investigation report when complete, to include current inspection programme for pipework under insulation and any modifications as a result of the investigation	31/03/2026

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

This CAR form has been issued in response to a report from the operator of the Valero Pembroke Refinery of a loss of containment of Vacuum Gas Oil (VGO) from a pipeline within the site boundary.

Incident

A report of a loss of containment was received by NRW on 8 December 2025. The operator reported that a pinhole leak had been found on 5 December in a 10-inch line carrying VGO between the process units and storage tanks. An estimated 17m³ of VGO has been lost to ground and the duration of the leak has been calculated by the operator to have been several days, based on the spread of the VGO from the source and around A-Track (a group of pipelines running north-south uphill towards the Fuel Oil Tank Farm and jetty).



Approximate area of spill within the pipeline track, A Track

At ambient temperature outside the steam-heated pipeline, VGO forms a waxy solid which prevented flow into the ground surface and limited surface flow away from the point of the leak.



Solidified VGO around spill area

The operator reports that upon identification of the leak, the line was isolated, depressurised and fitted with a clamp to cover the pinhole. The cause of the leak appeared to be corrosion underneath the insulation surrounding the line.

On the afternoon of 10 December 2025, a South West Industry Regulation Team officer attended the site, where the operator showed the extent of the spill, and access arrangements put in place to facilitate inspection and cleanup. A combination of methods to remove the spilled, solidified material is proposed - scraping up the material up where accessible and using steam jetting to remobilise in difficult to access areas.

A Schedule 5 Part A Notification relating to this incident was submitted to NRW by the operator on 10 December 2025.

Action: Operator to confirm measures taken to recover spilled VGO, including means of waste disposal.

Action: Operator to submit summary of investigation report when complete, to include current inspection programme for pipework under insulation and any modifications as a result of the investigation.

Compliance

Permit condition 3.1.1 states that there shall be no point source emissions to water except those listed in Schedule 3 of the permit. This breach has been assigned a non-compliance category of C3 under the sub-criterion IR3A(3) – Emissions to land.

The root cause of this incident has not been assessed in this CAR form, but will be revisited when the operator submits the investigation report summary.

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.