

Compliance Assessment Report CAR_NRW0050583

Permit being assessed: BV4223IE.

For: Llanelli Plant , **held by:** Huntsman Corporation (UK) Ltd

At: LLANELLI PLANT BYNEA , LLANELLI, LLANELLI, DYFED, SA14 9TE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/01/2026 between 10:00 and 13:00.

Parts of permit assessed: See Compliance Assessment Report.

NRW Lead Officer: Elliot Jones.

Report sent to: EHS Manager, Huntsman Cooperation Ltd,, on 13/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	

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
IR3B	Ensure IBCs are stored correctly with appropriate secondary containment and with clear signage indicating correct storage location.	Already completed

Criteria	Action needed	Complete by
IR3B	Perform Toolbox talk with appropriate operatives, highlighting the importance of correct storage of hazardous substances.	25/02/2026

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Huntsman Site Visit

Huntsman Corporation UK limited operates in accordance with EPR/BV4223IE

Huntsman operates a specialist organic chemical plant with a capacity of 37,000 tonnes per annum, located on the site of former Bynea Steel Works, running along the Eastern and North-Eastern boundaries is the River Loughor.

Attendees

- NRW Senior Industry Regulation Officer
- Huntsman Environment, Health & Safety Manager

Introduction

A scheduled site inspection of Huntsman Corporation UK Ltd was undertaken on 20th January 2026. An agenda was issued to the operator in advance to allow relevant documentation to be prepared.

On arrival, the NRW officer completed the required site induction, consisting of a short introductory video followed by a knowledge quiz.

General update

The operator provided a summary of production rates and site performance over the previous 12 months. Production levels have remained consistent with the trend observed over the last three years, with an increase in orders and output forecast for 2026.

Reed bed

The operator presented recent investments in the reed bed filtration lagoon, which treats weak effluent prior to discharge to the Loughor Estuary. Although performance has been stable with no recent emission breaches, remedial work is expected to enhance lagoon efficiency and further reduce in emissions emitted to water.

The improvements to the reed bed included:

- Replanting areas of the reed bed previously containing bare ground
- Removal of brambles and invasive vegetation.
- Renewal of flexible discharge pipework and lagoon water-level control pipework.
- Installation of solenoid valves to replace diaphragm valves, improving flow regulation.
- Reed bed efficiency sampling has been performed to ensure lagoon is operating at optimal efficiency.
- Repairs to surrounding safety fencing.

Site Drainage

During 2024 and through into 2025 the operator commissioned a drainage contractor to perform a comprehensive CCTV survey of the site drainage network, this included both the tank farm area and utilities area of the site. The inspection was carried out to determine the current integrity and operational performance of the drainage system.

The survey identified areas of the system containing minor fractures, joint displacement and areas of settled deposition. Despite these defects being identified within the system no major concerns were raised regarding the drainage systems performance during the inspection.

A successful drop test confirmed the system's ability to retain water, demonstrating adequate containment capacity.

The operator has incorporated annual drop testing and a five-yearly CCTV inspection into the preventative maintenance schedule, ensuring continued compliance with MSCC5 standards.

Decarbonisation

The operator is progressing plans to replace the ageing boiler with a modern, more efficient system. Once installed (date to be confirmed), the new boiler is expected to significantly reduce site emissions.

The site is also nearing completion of a full upgrade to LED lighting to improve energy efficiency and reliability.

Site inspection

During the site walkover officer visited the ammonia offloading station, tank farm and the

utility area.

NRW officer observed huntsman operative sampling one of the several scrubber units located in the tank farm area. Operator routinely samples the scrubber to verify scrubber solution adequacy prior to discharge.

During the walkover, one Intermediate Bulk Container (IBC) containing Hypochlorite was found stored without secondary containment in the utilities area, presenting a direct pollution risk to ground

Permit condition 3.2.3 Emissions of substances not controlled by emission limits states the following:

“All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.”

Incorrect storage of the liquid containers (IBC) is contrary to Environmental Permit Condition 3.2.3. In accordance with non-compliance scoring guidelines, a score of **C3** has been allocated against sub criteria **IR3B - Emission and Monitoring - Emissions of substances not controlled by emission limits.**

Action: Ensure IBCs are stored correctly with appropriate secondary containment and with clear signage indicating correct storage location.

Since the inspection, the operator has provided photographic evidence confirming relocation of the IBC to a compliant storage area with secondary containment.

Action: Perform Toolbox talk with appropriate operatives, highlighting the importance of correct storage of hazardous substances.

AOB

The operator is nearing completion of their climate risk assessment and expect to submit before the Regulation 61 notice deadline of the 1st April 2026.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.