

## Compliance Assessment Report CAR\_NRW0051721

**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:** Site Inspection,

**Reason:** Routine.

**On:** 27/02/2026 between 09:00 and 17:00.

**Parts of permit assessed:** IR3B.

**NRW Lead Officer:** Brigid Armstead.

**Report sent to:** Director, Alembic Manufacturing Ltd , on 08/05/2026.

### 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	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

### Purpose of Compliance Assessment

This Compliance Assessment Report (CAR) covers a site inspection undertaken on 27 February 2026 following notification from the operator on 9 January 2026 that the installation was in the process of shutting down the production facility.

The audit assessed site closure activities, containment, emissions, and waste management arrangements.

The installation comprises four units (Units 1, 6, 7 and 10) associated with the manufacture of aluminium chlorohydrate.

The scope of the inspection included:

- Site condition during decommissioning
- Containment infrastructure
- Waste management arrangements
- Inspection and maintenance procedures

The assessment did not include detailed review of historical production processes beyond their relevance to closure and environmental risk.

### Observations

#### 1. Site Closure Status

The operator confirmed that:

- Final production occurred in December 2025
- All process liquids have been removed from storage tanks
- Plant (including reactors and storage vessels) is being dismantled or sold
- Decommissioning waste is being removed by licensed contractors

At the time of inspection, process areas were being cleared and cleaned. IBCs containing wash water were present on site pending off-site removal.

#### 2. Containment

The following containment arrangements were in place during operation:

- **Unit 1:Used for storage of dry, insoluble materials only.**

- No bunding provided.

- **Units 6 and 7: Production area**

- Perimeter bunding present
- Reactors, bulk tanks, and filtration areas located within reinforced bunds constructed to retain full liquid inventory in the event of catastrophic failure

- **Unit 10: Used for storage of liquids in IBCs only**

- Perimeter bunding provided to prevent loss of containment

Based on observations and operator information, containment arrangements were appropriate to the risk profile of the installation.

### **3. Emissions and Waste Management**

The operator advised that:

- No process effluent was generated
- Atmospheric emissions were limited to hydrogen and steam, in line with the permit
- Waste streams included solid waste, granular waste, filter media, and packaging

Waste management arrangements included:

- Use of licensed waste contractors
- Segregation of recyclable materials (paper, cardboard, plastics)
- Regular removal of wastes from site

The operator stated that no pollution incidents have occurred and no remediation has been necessary.

### **4. Inspection and Maintenance**

The operator described the following inspection regime during operations:

- **Reactors:**

- Checked daily when in operation
- Emptied and internally inspected following each production run
- Cooling coils inspected and maintained regularly

- **Bunds and infrastructure:**

- Weekly visual inspections undertaken

- Records retained and made available

- **Bulk tanks and pipework:**

- Subject to daily visual inspection when in use
- Pipework located within bunded areas

- **Skips:**

- Checked upon delivery
- Removed promptly once filled

Records have been maintained for weekly visual checks to bunds, bulk storage, reactors, roadway and floors. These records were reviewed by NRW and found to be in order with any faults addressed promptly.

## **5. Site Condition**

At the time of inspection:

- No visible evidence of contamination or pollution was observed
- Containment systems were being dismantled for closure
- Closure activities were being undertaken in a controlled and orderly manner
- Waste handling arrangements were appropriate

The operator demonstrated consideration of the waste hierarchy, including reuse and resale of plant where practicable.

**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](mailto: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](mailto: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.