

Permit Reference Number: MP3431SP  
 Installation: Form Number: L1

Operator: Alembic Manufacturing Ltd.

**Reporting of Compliance with Low Impact Installation criteria for 2019**

<b>Criteria</b>	<b>Description</b>	<b>Demonstration of Compliance</b>
<b>Management techniques:</b>	All of the criteria described below must be met without having to rely on significant management effort. In other words, the installation intrinsically must have only a low environmental impact.	No changes have occurred to operations since issuing of low impact status permit, Installation still has intrinsically low environmental impact.
<b>Raw materials:</b>	The installation must not release more than 50 m <sup>3</sup> of water per day as waste water or effluent. No account need be taken of the volume of water exported from the installations as product.	Over 2019 we produced 6524 tonnes of liquid with a minimum water content of 57% = 3,719m <sup>3</sup> of water. Our total water use over this time calculated from attached water bills was 6718 m <sup>3</sup> so our discharge volume is <2999m <sup>3</sup> pa or < 8.2m <sup>3</sup> per day. Please note that, as we have recently replaced our cooling towers with an Adiabatic system, bleed to drain will cease and water usage will be lower per unit of production.
<b>Techniques to prevent and reduce waste arisings and emissions:</b>	The installation must comply with the criteria in this guidance without having to rely on active abatement. In particular, releases must not be dependent on continuing or correct operation of equipment.	No active abatement is in use or required at our facility
<b>Groundwater Regulations:</b>	There must be no planned release into the ground.	There are no planned releases into ground (and there have been no unplanned releases)
<b>Waste Production:</b>	The installation must not give rise to more than 1 tonne of controlled waste per day, averaged over a year, with not more than 20 tonnes being released in any one day. No more than 1% should be special waste.	No Hazardous waste was produced. A total of 16 tonnes of general office and packaging waste was produced ( Disposal one wheely bin per week@ 115kg = 6 tpa. A further 10 t of packaging waste was sent for recycling). Granular waste and filter papers amounted to 27.74t tonnes per annum overall average 10.076 t per day. Annual total 43.74 tonnes of which 0% was special/hazardous waste.
<b>Energy Consumption:</b>	The installation must not consume energy at a rate greater than either 1MW or, if the installation uses a combined heat and power installation to supply any internal process heat, 10 MW, or	As shown by attached electricity bills total electricity used was 71,937 KWhrs pa= 0.0088 MW. No fuel oil used this year.

	3MW if fuelled by waste oil.	Substances relevant to COMAH are nitric acid and fuel oil, kerosene, diesel and propane. These have been kept within the Maximum Storage quantities as in p29 and 30 of our permit application (attached) which are within 5% limit. Previous COMAH lower tier individual category for nitric acid has been removed and replaced by smaller level of 50t "Oxidising liquids". To stay within 5% of this we have reduced maximum inventory to 2t nitric acid =4%. (kerosene diesel and propane inventories are unchanged at 0.44%, 0.2% and 1.1% respectively) of lower tier COMAH.
<b>Accident Prevention:</b>	<p>The inventory of any substance at any time is not more than 5% of that in the COMAH Directive (lower tier) as set out in the Control of Major Accident Hazards Regulations 1999, Schedule 1.</p> <p>Updated version L111 2015 now in force has changes for nitric acid.</p>	
<b>Noise:</b>	<p>As judged by the criterion set out in BS 4142 the installation must be unlikely to give rise to any complaint of a discernible increase in noise. This implies that in any case the rating level should not be more than 5dB(A) below the residual noise at any point on the boundary of the installation, whenever the installation is operating. This level may have to be reduced when:</p> <ul style="list-style-type: none"> <li>• background noise levels as defined in BS4142 are below 30dB; or</li> <li>• the spectrum of noise from the installation contains discernible tones or impulses.</li> </ul>	<p>There is no discernible increase in noise at the boundary of installation compared to local environment.</p>
<b>Emissions of polluting substances:</b>	<p>There must be no likelihood of a release of a mass of any particular substance from the whole installation to the environment at a rate more than is set out in the Agency's IPPC HI guidance note<sup>1</sup> as "significant" (or as set out in any subsequent modification issued by the Agency).</p>	<p>Installation is operated within agreed limits, as per our permit application, there have been no incidents or fugitive emissions.</p>

	<p><b>Odour:</b></p> <p>There must be only a low potential for offence due to odour. An installation will not be considered as a low impact installation if it may give rise to an offensive smell noticeable outside the premises where the installation is operated.</p>	<p>The installation does not give rise to any offensive odours.</p>
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Signed   
 (authorised to sign as representative of the Operator)

Date: 13/11/2020

IPPC H1 "Environmental Assessment and Appraisal of BAT"