

This form will report compliance with your permit as determined by an NRW officer

Site	Barry Aluminium Chlorohydrate Plant EA/EPR/MP3431SP/V002	Permit Ref	MP3431SP		
Operator/Permit holder	Alembic Manufacturing Ltd				
Regime	Installations				
Date of assessment	22/01/2020	Time in	10:30	Out	11:45
Assessment type	Audit				
Parts of the permit assessed	Site Inspection				
Lead officer's name	Harris, Geraint				
Accompanied by	Green, Rebecca				
Recipient's name/position	David Randall/ Director	Date issued	27/01/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
<p>KEY: See Section 5 for breach categories, suspended scores will be indicated as such. A = Assessed or assessed in part (no evidence of non-compliance), X = Action only, O = Ongoing non-compliance, not scored.</p>		

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Alembic Manufacturing Limited

Permit MP3431SP

Site inspection and regulator handover 22nd January 2020.

The purpose of this visit was to hand regulation of the site under EPR from Rebecca Green to Geraint Harris. There was no formal agenda for the meeting as it was primarily a comprehensive site inspection.

No Non—Compliances were seen on the day of the visit.

Introductions with the company directors John Tann and David Randall were conducted. David Randall then conducted a tour of the three buildings. The main building houses the manufacturing processes. Alembic Manufacturing Limited is involved in the manufacture of aluminium chlorohydrate and zirconium products for the cosmetic industry at the Barry Dock Site. The main manufacturing process produces aluminium chlorohydrate. Aluminium metal is dissolved in basic aluminium chloride solution and water added to produce aluminium chlorohydrate. Hydrogen is evolved and saturated with hydrochloric acid. Aluminium chlorohydrate is collected in holding tanks prior to filtration. The solution is filtered and stored in a holding tank. Some of the processed aluminium chloroydrate is dispatched directly to customers, whilst the rest is subject to further manufacturing to produce zirconium products. The completed products are dispatched to customers in plastic chemical drums.

The installation is within 2km of two SSSIs – Hayes Point to Bendrick Rock and Barry Island and within 10km of a European Site – Severn Estuary. There are no emissions to water or sewer from this process. Environmental impacts from the processes are insignificant and the installation meets the criteria for a Low Impact Installation.

A site tour was undertaken under the guidance of the site manager. The site is a compact, with three industrial units occupied. The Inspection found the hard standing was in good condition. No gaps in site security were witnessed. No pests or vermin were seen. No noise, odour, uncontrolled wastes were visible. No invasive plant species were seen within the site boundary. The storage room for the coarse aluminium powder showed signs of water ingress in certain areas. Although not hazardous or reactive

with the contents of the store, site should monitor this and ensure that no environmental impact or production of extra waste will result.

During the site inspection it was noticed that a significant number of IBC's are used by the site to store various chemicals. A number of these IBC's appeared to be quite old. Although the products produced at Alembic are non-dangerous for transport I thought it pertinent to state 'The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) chapter 6.5.4.4.1'. I would like site to be aware that IBC's have a limited life and therefore they should consider the age of the IBC's prior to filling them with chemicals. It may be good practice for Alembic to check the age of the IBC's onsite and discard any old IBC's to reduce the likelihood of any future leaks.

ADR 6.5.4.4.1

Every metal, rigid plastics and composite IBC shall be inspected to the satisfaction of the competent

authority:

(a) Before it is put into service (including after remanufactured), and thereafter at intervals not

exceeding five years, with regard to:

(i) conformity to design type including marks;

(ii) internal and external condition;

(iii) proper functioning of service equipment.

Thermal insulation, if any, need be removed only to the extent necessary for a proper

examination of the body of the IBC.

(b) At intervals of not more than two and a half years, with regard to:

(i) external condition;

(ii) proper functioning of service equipment.

Thermal insulation, if any, need be removed only to the extent necessary for a proper

examination of the body of the IBC.

Each IBC shall correspond in all respects to its design type.

David informed NRW that Alembic may have future scope to expand the production capacity to include the synthesis of new products. They are currently sourcing new tanks for this purpose. David showed NRW where the new tank maybe positioned and was reminded of the requirement to have tanks located within suitable bunding.

END.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036237**

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Operator/Permit holder	Alembic Manufacturing Ltd	Date	22/01/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.