

Compliance Assessment Report CAR_NRW0037622

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 carried out: Report/Data Review, Reason: Routine.

On 12/02/2021.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Geraint Harris.

Report sent to: David Randall, Director on 12/02/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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

Total number of 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

Alembic Manufacturing Ltd

Permit EPR/MP3431SP**12TH February 2021**

The annual Low impact assessment L1, fugitive emissions report, the biennial accident prevention and control review and SPMP review were received on the 12th February 2021. In addition to these the following were also supplied: waste bills, recycling bills, energy (electricity bills), SPMP records and water bills.

Low impact assessment L1:

All criteria to meet the Low Impact criteria were met in 2020.

SPMP Review:

The review of the Site Protection and Monitoring Plan was reviewed in 2020 with no changes and supporting evidence for monitoring the site was provided and accepted.

Fugitive Emissions:

There were no fugitive emissions during 2020.

Accident and prevention:

No environmental accidents were recorded in 2020.

Other requirements:

Alembic were asked how they comply with permit conditions 2.7.2 and 4.1.5:

- | | |
|-------|--|
| 2.7.2 | The Operator shall maintain and update annually an energy management system which shall include, in particular, the monitoring of energy flows and targeting of areas for improving energy efficiency. |
| 4.1.5 | Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year's progress against such targets. |

The response to these conditions are as follows:

With regard to energy monitoring, management and efficiency items 2.7.2 and 4.1.5. We do not have formal targets for annual improvements as our emissions levels are so minimal and our options on a rented site with one source of energy (mains electricity) are so limited.

That said we do minimise consumption, as you can see from our very modest consumption equivalent to c. 4.6 t carbon per annum based on mean UK grid intensity of 0.256kg CO₂ per KWhr (0.064kg C/KWhr). We do not heat or cool the main site, only heating small enclosed areas such as Labs, offices., canteen for H & S purposes.

We have over the years taken advantage of energy saving technology by installing LED lighting where it is compatible with the working environment. We also use waste heat from the main reactors to minimise electric heating in secondary reactors.

In addition the company has successfully applied for Glas Tir Scheme for a woodland creation scheme in mid Wales (Cwmcringlyn Bank) this site of c 80 hectares should on YC of 12 sequester an average of c. 100t pa Carbon over the next 30-40 years, planting is planned for next winter and once trees are established

(within 5 years) should annually absorb more CO₂ than emitted in the lifetime of our site.

Permit conditions 2.7.2/2.8./4.1.4./4.1.5./4.1.7. Have all been achieved.

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 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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.