

ALEMBIC MANUFACTURING LTD

UNIT 6, WIMBOURNE BUILDINGS
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Natural Resources Wales
PPC Compliance team
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16 JAN 2015



Dear Rebecca,

14 January 2015

Re: Permit Condition 4.14 and 2.8.1 Permit no. MP3431SP

4.1.4 Annual; review of Fugitive emissions

I can confirm that there were no fugitive emissions from our site in 2014.

2.8.1 (accident prevention and control)

I am pleased to report that there have been no accidents having environmental implications during 2014. We have reviewed our accident management plans described in pages 29-30 of our application and have not found any reasons to alter them.

Yours sincerely,

David Randall

INTRODUCTION	LOW IMPACT DETERMINATION	TECHNIQUES	IMPACT
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2.7.2 Techniques to Reduce the Risks

2.7.2.1 General Provisions

The company does not have any specific procedures have for dealing with emergency or non-standard operating conditions that have been identified as having environmental implications (e.g. spillages, pollution control equipment failure). However, the precise incident response actions depend on the category and severity of environmental incident.

ALEMBIC MANUFACTURING Ltd have response plans for dealing with situations such as spillages, plant failure, fires, etc which should facilitate the prevention or minimisation of pollution arising from such occurrences. Staff have been trained and practised in implementing such plans. Where pollution is likely to have occurred and/or where an offence has occurred, ALEMBIC MANUFACTURING Ltd will ensure that all dealings with regulators or aggrieved parties are handled by the one of the Director's.

Emergency Response Actions

The installation employs a basic spill response procedure which is summarised below:

- the Director will be notified (who will notify the Authorities where appropriate);
- in the event of a leak, further leakages will be stopped and leaked substances prevented from migrating via site service corridors or other conduits (e.g. drains and ducts). Spilled material will be prevented from escaping from the site;
- infiltration via unsurfaced ground will be prevented (e.g., absorbent material will be thrown down or spilled material channelled away from unsurfaced ground); and
- all spill incidents will be documented, including the actions taken and final outcome.

Materials contaminated with the leaked substance will be handled carefully and properly disposed of in accordance with the Duty of Care Regulations. Waste will be collected and deposited in polythene type bags (and/or lidded drums), clearly identified and labelled with the contents, and disposed of via approved Waste Contractors.

Accident Prevention Summary

RGS No.7: 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 2005, Schedule 1.

In general it is highly unlikely that there will be any major or significant incidents at the installation, given the relatively low volumes of the materials used and that the installation intrinsically only has a low impact.

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ALEMBIC MANUFACTURING Ltd installation does not, in the company's opinion, pose a significant threat to the environment under either normal or abnormal and emergency operating conditions.

The inventory of any of the raw materials at the installation is less than 5% of those set out in the Control of Major Accident Hazards Regulations 2005, Schedule 1. It is deemed that 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 2005, Schedule 1.

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Accident scenario	Environmental Impact	Significant [Y / N]	Controls to Prevent or Minimise Impact
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Fire	Contaminated fire fighting runoff could damage the STW and contaminate the soil and surface watercourses	N	- Installation consists of hardstanding - All chemicals are stored internal to the building - Storm water drains are connected to the foul sewer
Vandalism causing an environmental incident (this is not in the aspects register)	Escape of hazardous materials could cause damage to soil, watercourses or the atmosphere	N	- ABP has access control - Site has 24 hour security and 12 CCTV cameras.

Table 10: Summary of the Impacts Associated with Emergency Situations

Table 10 gives an indication of the potential threats to the environment, the significance of related environmental impacts, and proposed mitigation measures. On the whole ALEMBIC MANUFACTURING Ltd considers that its installation poses minimal risk of long-term environmental impairment given the relatively low inventory of potentially polluting materials that will be used and the effective controls applied to storage and handling of chemicals and wastes. ALEMBIC MANUFACTURING Ltd also considers that the installation intrinsically only has a low impact.

The site is not a COMAH installation (the quantity of chemicals stored is not enough to require regulation under the Control of Major Accident Hazards Regulations 2005).

A summary of the raw materials inventory for the installation is presented in Table 11 below:

Raw and Auxiliary Materials	Maximum Storage Quantities (Tonnes)	COMAH Directive Substance	% of COMAH Directive (lower tier)
Aluminium Powder	65	N	N/A
Aluminium Trichloride	50	N	N/A
Zirconium Oxychloride	20	N	N/A
Zirconium Hydroxycarbonate	20	N	N/A
Glycine	4	N	N/A
Sodium Formate	3	N	N/A
Nitric Acid	2.8	Y	0.056
Acetic Acid	3	N	N/A
Citric Acid	0.5	N	N/A
Formic Acid	12	N	N/A
Fuel Oil - kerosene	2.2	Y	0.44

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Diesel	1	Y	0.2
Propane	0.11	Y	1.1

Table 11: Raw Materials Inventory

The inventory of any of the raw materials at the installation is not more than 5% as set out in the Control of Major Accident Hazards Regulations 2005, Schedule 1.

The Application Site Report gives an assessment of the environmental sensitivity of the site and surrounding area and of the availability of pathways. It is considered that the surrounding environment is moderately sensitive to any abnormal or emergency conditions on the site.