

22 JAN 2016

ALEMBIC MANUFACTURING LTD



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Fao Elisabeth Parr/Rebecca Green
PPC Compliance Team
Natural Resources Wales
Rivers House,
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St. Mellons,
CARDIFF
CF3 OEY

22 January 2016

Dear Rebecca & Liz,

Re: Permit Condition 4.14 Permit no. MP3431SP

4.1.4 Annual; review of Fugitive emissions

I can confirm that there were no fugitive emissions from our site in 2015.

Yours sincerely,

David Randall

Permit Reference Number: MP3431SP

Operator: Alembic Manufacturing Ltd.

Installation: Form Number: L1

Reporting of Compliance with Low Impact Installation criteria for 2015

Criteria	Description	Demonstration of Compliance
Management techniques:	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.
Raw materials:	The installation must not release more than 50 m ³ 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 2015 we produced 8,462 tonnes of liquid with a minimum water content of 57% = 4,823m ³ of water. Our total water use over this time calculated from attached water bills was 8038 m ³ so our discharge volume is <3215m ³ pa or < 8.8m ³ per day.
Techniques to prevent and reduce waste arisings and emissions:	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
Groundwater Regulations:	There must be no planned release into the ground.	There are no planned releases into ground (and there have been no unplanned releases)
Waste Production:	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 28.4 tonnes per annum overall averageplus one ibc of non-hazardous washings (floor washings of spilt Reza67 1tonne)total 29.4t 0.08 t per day Annual total 45.4 tonnes of which 0% was special/hazardous waste.
Energy Consumption:	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 3MW if fuelled by waste oil.	As shown by attached electricity bills total electricity used was 110,597 KWhrs pa = 0.013 MW. No fuel oil used this year.

Accident Prevention:	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.	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 p27 and 28 of our permit application (attached) which are well within 5% limit. (0.056 and 0.44%, 0.2% and 1.1% respectively) of lower tier COMAH.
Noise:	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: - background noise levels as defined in BS4142 are below 30dB; or - the spectrum of noise from the installation contains discernible tones or impulses.	There is no discernible increase in noise at the boundary of installation compared to local environment.
Emissions of polluting substances:	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 H1 guidance note ¹ as "significant" (or as set out in any subsequent modification issued by the Agency).	Installation is operated within agreed limits, as per our permit application, there have been no incidents or fugitive emissions.
Odour:	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.	The installation does not give rise to any offensive odours.

Signed  (authorised to sign as representative of the Operator)

Date 22/1/16

IPPC H1 "Environmental Assessment and Appraisal of BAT"

INTRODUCTION	LOW IMPACT DETERMINATION	TECHNIQUES	IMPACT
Accident scenario	Environmental Impact	Significant [Y / N]	Controls to Prevent or Minimise Impact
			up
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

INTRODUCTION	LOW IMPACT DETERMINATION	TECHNIQUES	IMPACT
	1	Y	0.2
Diesel	0.11	Y	1.1
Propane			

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.

