

ALEMBIC MANUFACTURING LTD

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Fao Elisabeth Parr
Natural Resources Wales
Rivers House,
St. Mellons Business Park,
Fortran Road,
St. Mellons,
CARDIFF
CF3 OEY

19 January 2017

Dear Elisabeth,

Re: Permit Condition 4.14 and 2.8.1 Permit no. MP3431SP

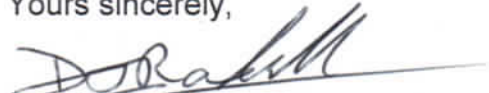
4.1.4 Annual; review of Fugitive emissions

I can confirm that there were no fugitive emissions from our site in 2016.

2.8.1 Accident prevention and control (biennial review)

I am please to report that there have been no accidents having environmental implications during 2015 or 2016. 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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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 2	Y	0.056 4
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
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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.

2015 DOR

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.