

Compliance Assessment Report CAR_NRW0040080

Permit being assessed: BB3790FX.

For: ALUK (GB) LTD, held by ALUK (GB) Ltd

At: Aluk GB Ltd, Newhouse Farm Industrial Estate, Mathern, Chepstow, Monmouthshire, NP16 6UD.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 28/06/2022.

Parts of permit assessed: Actions from CAR_NRW0039920

NRW Lead Officer: Rebecca Green.

Report sent to: Anna Plesniar, Process Development Scientist on 29/06/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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

Several important actions for ALUK to complete were identified during a site visit by Natural Resources Wales (NRW) on 16th May 2022. A virtual meeting between ALUK and NRW was held on 28th June 2022 to review progress with the actions.

Action 1: Relevant personnel to read and understand "How to Comply with your Environmental Permit". A copy has already been emailed to those present at this meeting.

Evidence was seen that relevant personnel have read the guidance. There were no questions.

Action 1 has been completed and can therefore be closed.

Action 2: Prepare an internal audit schedule, complying with the guidance above, which includes as a minimum, maintenance, the effluent treatment plant, production processes and monitoring. A copy to be received by NRW by 30th June 2022.

The internal audit schedule was seen and it appears fit for purpose.

Action 2 has been completed and can therefore be closed.

Action 3: Evidence of a completed audit should be received by NRW by 30th June 2022.

The audit report form for a recent audit of the water treatment process was seen. The audit was a thorough review of the process, using existing documentation as the reference point. The findings and any actions were clearly explained.

Action 3 has been completed and can therefore be closed.

Action 4: Improve and formalise CAR review process, ensuring all relevant personnel are included. ALUK are in the process of developing an improved CAR review process. There will be regular meetings attended by EHS, maintenance, quality and other departments as necessary. ALUK should ensure that minutes of these meetings are recorded and retained.

Action 4 has been completed and can therefore be closed.

Action 5: Identify plant, equipment and components critical to the site's operation, control and environmental performance. Add to the critical equipment list with the necessary information. NRW to receive confirmation that this has been completed by 30th June 2022.

A list of critical equipment was seen. It contained order lead times, stock levels and costs.

Action 5 has been completed and can therefore be closed.

Action 6: Update the planned preventative maintenance programme (PPMP) to include all critical equipment, components and plant identified in Action 5 above. NRW to receive confirmation by 30th June 2022.

An updated PPMP was seen. NRW will audit the maintenance system later in the year to assess how it is operating in practice.

Action 6 has been completed and can therefore be closed.

NRW are very pleased that all the actions above have been completed in such a timely manner and hope that the recent difficulties have now been overcome.

Monitoring emissions to sewer

ALUK have agreed to investigate the reason for the discrepancies between analytical results received from Dwr Cymru Welsh Water (DCWW) and their analytical laboratory. The aluminium (Al) concentration, according to DCWW in a sample taken on 17th May 2022, was 1.4mg/L. The result from ALUK's laboratory was 0.35mg/L. The pH also differed by 0.5 units. On 31st May the Al concentration found by DCWW was 0.2mg/L, whereas the result from ALUK's laboratory was 0.018mg/L. The pH was the same. In both cases ALUK's laboratory recorded that the sample was received six days after it was taken.

It may be beneficial for ALUK to audit the procedure that their personnel use when a split sample is taken with DCWW. They could also discuss the matter with their analytical laboratory.

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.