

Sol Environment Limited

Unit 5.3, Paintworks,
Bristol, BS4 3EH

t. +44 (0) 1684 572727
enquiries@sol-environment.co.uk



William Wallace,
Wales Permitting Centre (Cardiff),
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff,
CF24 0TP

Date: 8th September 2022

Our Ref: SOL2106RA01

Dear William,

RE: REAL ALLOY UK LIMITED – WAUNARLWYDD WORKS EPR/EP3935UC/V008

Further to your letter dated 25th August, please find below response to each of your questions in turn:

- 1. Provide us with more information to question Form C2 question 3d3. We need a more detailed summary of your environmental management system and which parts have changed as a result of the variation.*

Real Alloy UK Limited have an Integrated Management System.

Real Alloy are accredited to ISO 14001:2015 (Environmental) and ISO 9001 (Quality) and are audited by an external provider (TUV).

In addition to the above, Real Alloy is audited annually internally by colleagues from the EU Head Office.

On a daily basis, there are management meetings represented by each department head where the following topics are discussed:

- Health Safety & Environment;
- Production;
- Maintenance;
- Shipping & Receiving,
- Finance; and
- HR.

Daily walkabouts are completed by managers and housekeeping audits of their respective areas.

Real Alloy are members of the Aluminium Federation and the HSE Manager of Real Alloy, Swansea, chairs the ALFED UK HSE Group.

Please refer to Real Alloy's EMS certification provided within *Annex 1 – EMS Certification*.

The only change to the management system as a result of this permit application will be the inclusion of a Production Work Instruction procedure relating to the shredder and associated balers.

All other procedures will be operated as per currently permitted.

2. *Provide a copy of your Accident Management Plan (AMP) and advise of any changes that have been made to the plan as a result of your proposed changes to site operations.*

Please find a copy of the sites Accident Management Plan provided within *Annex 2 – Accident Management Plan*.

The only change to the Accident Management Plan is the addition of the shredding equipment in Section 4. All other emergency information remains as detailed within the plan.

3. *Provide us with more information on potential dust arisings from the shredder and compaction processes, as well as details of your proposed dust management techniques, in particular how dust will be captured and disposed of.*

Real Alloy has undertaken testing to determine the likelihood of dust arising from the shredding and compaction of aluminium cans. The aluminium cans are ductile, as such the process does not create significant amounts of dust. Real Alloys testing has confirmed this. Dust would only be expected with brittle alloys, which are not being processed.

Nevertheless, as part of the sites daily inspections the area will be visually inspected to ensure there are no dust emissions from the process. If dust emissions are identified then they will be immediately cleaned and disposed of. Real Alloy will create a specific cleaning procedure for this in the unlikely event dust emissions become an issue.

4. *Supply a copy of relevant calibration certificates for all acoustic equipment used for the noise measurements for the noise impact assessment.*

Please refer to the calibration certificates provided within *Annex 3 – Calibration Certification*.

The 01dB was used for the background survey and the NOR 118 was used for the plant measurements.

Should you have any further questions in relation to the above please do not hesitate to contact me.

Yours sincerely,



Sophie Rainey

ANNEX 1: EMS CERTIFICATION

ANNEX 2: ACCIDENT MANAGEMENT PLAN

ANNEX 3: CALIBRATION CERTIFICATION