

Compliance Assessment Report CAR_NRW0040983

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 23/01/2023.

Parts of permit assessed: 4.2.2 Annual Reports 2022; 4.2.3 Emissions to Air 2022

NRW Lead Officer: Rebecca Green.

Report sent to: Toby Ambler, Head of Health, Safety and Environment on 31/01/2023.

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)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	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

Forms Air1, Emissions to Air, WaterUsage1, Energy1 and Performance1 for 2022 and the 2022 Annual Performance Activity Review were all received on 23rd January 2023. Forms S1, Emissions to Sewer and W1, Emissions to Water, for 1st October to 31st December 2022 were also received on 23rd January 2023.

All the reports are accepted.

Air1, Emissions to Air, 2022

All parameters were much less than their respective emission limit values (ELV) for the third year running.

Sewer1, Emissions to Sewer, 1st October to 31st December 2022

All parameters were within their respective ELVs.

Water1, Emissions to Water, 1st October to 31st December 2022

All parameters for emissions from W1 were within their respective ELVs.

The ELV for pH at W2 was exceeded on 15th November 2022. The measured value was 5.83; the ELV is 6.0. After suitable investigations by AIUK, Natural Resources Wales (NRW) decided that no further action was necessary.

WaterUsage1, 2022

Total water usage was less than in 2021, but use per tonne of production (ptp) increased by about 10%, compared with 2021.

Energy1, 2022

Electricity and gas use and associated CO₂ generation were all lower than in 2021. Gas and electricity use both increased by about 4% ptp. Associated CO₂ emissions decreased by about 5% ptp.

Performance1, 2022

Production was lower than in 2021, due to external economic factors. It decreased by more than 15%.

Total waste generated was less than in 2021 but about 15% higher ptp than in 2021. The total amount of hazardous waste was less than in 2021 and almost 40% less ptp, primarily due to the decrease in production volumes. More non-hazardous waste was generated, rising by about 25% ptp. Waste sent to landfill was less than in 2021 but rose by about 9% ptp, compared with 2021. More waste was recycled than in 2021, increasing by about 25% ptp.

The reduction in production volumes largely accounts for the increases in waste generated. The large

increase in recycled waste is very encouraging.

Annual Performance Review 2022

A comprehensive review of monitoring and AIUK's environmental performance in 2022. AIUK's financial year runs from 1st September to 31st August and EMS targets are aligned with the financial, not calendar, year.

Emissions to water in 2022 were less than their ELVs, except for the pH exceedance mentioned above.

There were several breaches of the ELV for aluminium (Al) emissions to sewer in 2022. Root causes were identified and appropriate corrective actions taken. AIUK now hold a spare MCERTS flowmeter in stock.

AIUK might like to consider presenting annual emissions data in this report, rather than the Q4 results. This would give a better representation of the site's emissions to water and sewer over the previous year.

Water consumption is discussed above. There was a water leak in Q1 2022 which may have contributed to the increase in ptp usage. Overnight flows have been reduced since August which should help to reduce consumption in the future.

More electricity is generated from renewable sources resulting in lower associated CO₂ emissions. Unused or unnecessary lights are now turned off overnight and at weekends.

Gas consumption fell in 2022 due to reduced production.

Waste generation is discussed above.

AIUK are developing a corporate Carbon Reduction Plan which will set an annual carbon management cycle, calculate carbon footprints and set an annual action plan with targets.

It has not proved feasible to reduce the amount of packaging used on final product.

Routes for recycling or re-use of waste powder paint continue to be investigated.

An OMA (Operator Monitoring Assessment) audit was conducted by NRW in August 2022 and the MCERTS management system was externally audited in October 2022.

Communication of environmental matters has been extended and the remit of existing meetings widened.

The setting of environmental and quality objectives is being reviewed so that they will align with the business strategy.

Seven staff have been trained as internal auditors for BS ISO14001:2015.

A new process, "Environmental Change Request", has been developed to ensure that all aspects of any proposed change are fully assessed for any unforeseen environmental effects, before the change is approved. This is an excellent example of best practice and AIUK deserve recognition for its development.

This has been another difficult year for manufacturing industry, again due to external factors beyond their control which is the main cause of the disappointing performance results ptp. However, CO₂ emissions ptp have decreased and the amount of recycled waste ptp has increased significantly. Less hazardous waste ptp was generated and changes in some maintenance regimes should see this continued in 2023.

The accuracy of the in-line aluminium monitor still needs to be addressed.

AIUK continue to devote considerable time and resources to minimising their environmental impact and this has been reflected in their permit compliance in 2022 and the recent OMA audit scores.

NRW recognise and applaud this commitment. The open relationship that has developed between AIUK and NRW is appreciated and we look forward to its continuation in 2023.

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.