

Compliance Assessment Report CAR_NRW0043255

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: Report/Data Review,

Reason: Routine.

On: 24/01/2024.

Parts of permit assessed: 4.2.2 Annual Reports 2023 & Annual Performance Review 2023; 4.2.3 Emissions to Air 2023.

NRW Lead Officer: Rebecca Green.

Report sent to: Toby Ambler, Head of Health, Safety and Environment, on 30/01/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total 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 2023 and the 2023 Annual Performance Activity Review were all received on 24th January 2024. Forms S1, Emissions to Sewer and W1, Emissions to Water, for 1st October to 31st December 2023 were also received on 24th January 2024.

All the reports are accepted.

Air1, Emissions to Air, 2023

There were no emissions from emission point A1 because the anodising plant was not operated in 2023. All emissions from A2 were much less than their respective emission limit values (ELV) for the fourth year running.

Sewer1, Emissions to Sewer, 1st October to 31st December 2023

The ELV for aluminium (Al) was exceeded on 5th December 2023. The concentration was 3.7mg/L and the ELV is 2.0mg/L. Flow and pH were within their respective ELVs.

Water1, Emissions to Water, 1st October to 31st December 2023

All parameters were within their respective ELVs.

WaterUsage1, 2023

Total water usage was less than in 2022, but use per tonne of production (ptp) increased slightly. The CO₂ associated with water supply was lower than in 2022 and rose slightly ptp.

Energy1, 2023

Electricity and gas use and associated CO₂ generation were all lower than in 2022. Gas use increased by more than 20% ptp but electricity use ptp was similar to that in 2022. Associated CO₂ emissions increased slightly ptp.

Performance1, 2023

Production was lower than in 2022, due to external economic factors. It decreased by about 19%. Total waste generated was less than in 2022 and about 8% lower ptp than in 2022. The total amount of hazardous waste was less than in 2022 and almost half the amount ptp, primarily due to the decrease in production volumes. Less non-hazardous waste was generated, decreasing slightly ptp. Waste sent to landfill was less than in 2022 but rose by more than 15% ptp. Less waste was recycled

than in 2022, decreasing slightly ptp.

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

Annual Performance Review 2023

A comprehensive review of monitoring and ALUK's environmental performance in 2023. ALUK's financial year runs from 1st September to 31st August and EMS targets are aligned with the financial, not calendar, year.

There were two breaches of the ELV for Al emissions to sewer in 2023. Root causes were identified and appropriate corrective actions taken.

Emissions to water and air, water and energy consumption, production volumes and waste generation are discussed above.

ALUK set themselves several environmental targets for 2023.

- reduction of electricity and gas consumption by 10% each. Electricity consumption was reduced by 18.7%;
- reduction of waste tonnage to landfill to below 100 tonnes. Waste sent to landfill was 94.42 tonnes;
- reducing the mileage of field support personnel by 50%. Mileage was reduced by 34%. New leased vehicles will have a lower engine capacity.

An MCERTS audit was carried out and ALUK were re-certified until December 2026.

The periodic Environment Permit Review meetings continue.

The monthly EHS meetings continue.

ALUK have developed an in-house analytical method for Al in the discharge from the effluent treatment plant. This method has shown good correlation with analysis results from an ISO17025 accredited laboratory. It will replace the in-line Al monitor, which has been decommissioned and removed from service, as the daily performance check on the ETP's performance. The results cannot be used for the quarterly emissions report to Natural Resources Wales (NRW) because ALUK's laboratory is not ISO17025 accredited.

A composite sampler has been installed for the discharge to sewer. Weekly samples will be taken and analysed by an ISO17025 accredited laboratory. Starting from 1st January 2024, these results will be used for the quarterly emission reports sent to NRW, which require that a weekly average is reported.

Dwr Cymru will continue to take spot samples from the discharge point S1.

This has been another difficult year for manufacturing industry, again due to external factors beyond their control. Despite lower production volumes, ALUK have managed to use a similar amount of water and electricity ptp, but gas consumption ptp has increased. Waste generation ptp continues to fall, but the increase in material sent to landfill ptp is disappointing. Reporting the CO₂ generation associated with water supply is very useful and should be continued.

ALUK continue to maintain their high standards, devoting considerable time and resources to minimising their environmental impact and improving their management techniques. They have developed a good understanding and control of the ETP, which has been the main source of past non-compliance issues.

NRW look forward to working with ALUK in 2024.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.