

Compliance Assessment Report CAR_NRW0044349

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: Site Inspection,

Reason: Routine.

On: 21/05/2024 between 10:00 and 12:00.

Parts of permit assessed: Site Visit and Update.

NRW Lead Officer: Rebecca Green, accompanied by Wayne Grimstead.

Report sent to: Toby Ambler, Head of Health & Safety and Environment, on 22/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR1A - Installations - Management - General Management	Assessed (A)	
IR1C - Installations - Management - Energy Efficiency	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	Assessed (A)	
IR4A - Installations - Information - Records	Assessed (A)	
IR4B - Installations - 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?

Criteria	Action needed	Complete by
IR3E	Obtain uncertainty values for measured parameters from external laboratory.	01/07/2024

Compliance criteria codes are listed in the 'Important information' section below.

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

The purpose of this inspection was to update Natural Resources Wales (NRW) on ALUK's present activities and future developments prior to Rebecca Green's retirement.

ALUK had kindly invited NRW to attend the monthly Environmental Permitting Review (EPR) meeting. This is a comprehensive review of all matters pertaining to environmental management, including emissions to air, water and sewer. This meeting was attended by the Operations Director, the Head of Health, Safety and Environment, the Production Manager, the Continuous Improvement Lead, the Water Treatment Plant Team Leader and the QHSE Technician. Additional personnel may also attend.

The scope of, and attendance at, this meeting demonstrate industry best practice and ALUK should be commended for instigating and running it to a set schedule.

Following the EPR meeting, there was a separate meeting to discuss other matters.

Present at this meeting were -

- TA, Head of Health, Safety and Environment, ALUK;
- AL, Continuous Improvement Lead, ALUK;
- LD, Water Treatment Plant Team Leader, ALUK;
- Wayne Grimstead, (WG) Team Leader, Industry Regulation South East (IR SE), NRW and Rebecca Green, (RVG), Senior Officer, IR SE (site officer), NRW.

WG explained future arrangements for regulation of the site. ALUK have a good compliance record and, in NRW's opinion, the site's operations pose a small risk to the environment. Consequently, ALUK will not, at present, have a designated site officer. They have received an email detailing future arrangements and should continue to send all monitoring data to Liz Parr.

RVG notified ALUK that the BRef review for the Surface Treatment of Metals and Plastics sector has begun and advised them to contact their trade association as soon as possible so that they can have an input into the process. It may also be worthwhile for them to contact the Surface Engineering Association (info@sea.org.uk) who have wide influence in these matters.

AL asked if it would be possible to use a mass balance metric for the emission limit value for aluminium emissions to sewer, instead of the weekly average concentration in mg/L. NRW would not support this approach.

The anodising plant has not been in use so far this year.

ALUK have employed a new contract analytical laboratory who are ISO17025 accredited for the analysis of trade effluent and provide quick turnaround times (around three to four days). The chain of custody is also better than the previous contractor. Examples of several reports, Certificates of Analysis, were seen. None stated the uncertainty for any of the measured parameters. ALUK should ensure that they know the uncertainty values so that they can be submitted on the next quarterly monitoring reports. For Q2, these are due by 31st July 2024. **See Action IR3E above.**

The quadrennial Energy Efficiency review is due this year. A simple synopsis will be sufficient because ALUK submit a detailed review as part of their annual reporting submission.

Arrangements for groundwater and soil monitoring are in hand.

Site Inspection

This was limited to the laboratory and the waste water treatment area.

The areas were clean and tidy with no obstructions. LD explained the internal analysis method for aluminium in the discharge to sewer. The correlation between results from this method and those from the analytical laboratory has been calculated. The internal method gives slightly higher values. The composite sampler was seen and its operation explained. ALUK should monitor the state of the tubing because it can go hard around the pump head area and could leak. The tubing should be included on the Planned Maintenance Programme and the Critical Equipment List.

ALUK have recently installed an MCERTS accredited pH meter on the line that discharges to sewer.

NRW appreciate the open and co-operative relationship that has been developed with ALUK and hope that this will continue into the future.

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.