

Compliance Assessment Report CAR_NRW0045364

Permit being assessed: BK3638IF.

For: Wrexham Aluminium Works EPR/BK3638IF, **held by:** HYDRO ALUMINIUM DEESIDE LTD

At: BRIDGE ROAD WREXHAM INDUSTRIAL ESTATE , WREXHAM, WREXHAM, LL13 9SQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/10/2024 between 10:10 and 12:00.

Parts of permit assessed: See Report.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Rebecca Harwood.

Report sent to: HSE Manager, HSE Manager, on 16/10/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR4C - Installations - Information - Notification	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	

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
IR3D	Forward a copy of the latest site noise and vibration management plan	25/10/2024
IR3E	Review future stack design to prevent adverse weather affecting the probes as part of the baghouse review	30/06/2025
IR4C	As per permit condition 4.3.2 please complete and submit Part B's for both Schedule 5's.	25/10/2024
IR3E	Provide the raw data/report from the calibration of the probe relating to A1 emission point	25/10/2024

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

This Compliance Assessment Report (CAR) has been raised following a routine site inspection.

A detailed tour of the site was provided by the HSE Manager accompanied by the Engineering Manager.

The site was clean, tidy and well organised. The permitted air emission points were viewed along with the installation activities. The operation of the bag filters and stacks were comprehensively explained by the engineering manager.

The company is currently reviewing the possibility of installing a completely new bag filter system to replace the existing. Permit variation advice has been previously provided but was again discussed during the site inspection.

Advice and Guidance

A permit variation is required for a change to the bag filter system. This should be submitted as soon as reasonably practicable due to the current delays within NRW's permitting queue.

Discussions were held on the two Schedule 5 notifications that have been received this year. Part B's have not been submitted for the exceedances of the particulate emission limit

value (ELV) dated 08/02/24 and 20/07/24 from emission point A1.

Action 1

As per permit condition 4.3.2 please complete and submit Part B's for both Schedule 5's by 25th October 2024

The site stated they have had issues on and off over time relating to weather affecting the probe on the A1 stack. This stack is a slightly different design to the A12 stack emission point.

Action 2

Review future stack design to prevent adverse weather affecting the probes as part of the baghouse review.

The breach of the ELV in February this year related to technical issues with calibrating the particulate emission probe which have now been resolved.

Action 3

Provide the raw data/report from the calibrations of the probe relating to the A1 emission point by 25th October 2024

Noise

The site confirmed they undertake an annual noise survey usually in December both during the day and night time with equipment running and turned off. The results of these are summarised in the sites annual report and includes an analysis to show if noise levels have increased or decreased over time.

The residential area of Pentre Maelor was visited following an incident report received (WIRS 2413101). Traffic noise was the dominant noise source along Bridge Road South, but along The Oval a fan type noise could be heard. This could not be specifically attributed to the site due to the number of other industrial units in the area.

Action 4

Forward a copy of the latest site noise and vibration management plan by 25th October 2024

Thank you for your time during the inspection.

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.