

## Annual Environmental Performance Report 2024

This Annual Environmental performance report has been prepared to meet the reporting requirements of permit condition 4.2.2. Permit condition 4.2.2 reads;

A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year.

The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data.

Table 1 provides the annual averages of the site effluent discharge. All the listed parameters are tested in-house, including suspended solids. Welsh Water also carry out testing on our discharge on a twice monthly basis. Their analysis determines the suspended solids from the discharge leaving site.

The maximum quantity of trade effluent discharge allowed from our site is 120 cubic meters per day. The consent limits are listed in Table 1 below.

Table 1

Parameter	Consent Limits mg/l	Annual Averages
<b>COD (5)</b>	8500	<1000
<b>Suspended Solids</b>	1500	129
<b>Sulphate</b>	500	<200
<b>Copper</b>	1.0	0.20
<b>Lead</b>	2.0	0.20
<b>Nickel</b>	1.0	0.18
<b>Zinc</b>	2.0	0.34
<b>Ammonia</b>	125	36
<b>pH</b>	6 to 11	7.65

We performed well against our parameters. Although we did experience one breach of zinc from the Welsh Water testing on 21<sup>st</sup> May 2024, recorded at 2.1. Following investigation, we could not determine from wastes received how this could have happened and it was attributed to tanker washouts immediately prior to the testing. It was tested again by Welsh Water following the breach and we received notification that the zinc level had come back down to acceptable levels. A schedule 5 notification was submitted to NRW and the decision was taken that as the exceedance was within the uncertainty level and less than 10% above the ELV for zinc emissions to sewer, that NRW would not be taking any further action.

In accordance with requirements specified within BAT Conclusions of the Waste Treatment BREF Document (EU 2018) in relation to BAT 7 – Monitor Emissions to Water, during 2023 GD were required to carry out a period of testing so that NRW could make a decision on which parameters were to be tested going forward. Following this period of testing, NRW made the decision to reduce monitoring frequencies to monthly for: AOX (adsorbable organically bound halogens), BTEX (benzene, toluene, ethylbenzene, xylene) HOI (hydrocarbon oil index), arsenic, cadmium, copper, zinc, nickel, lead and manganese.

PFOA and PFOS must be monitored every six months. Free cyanide, chromium,

chromium VI and mercury were not found to be relevant and so GD are not required to monitor these parameters.

These testing requirements came into effect in January 2024. An amended S1 form was provided in order for GD to report these external testing results on a quarterly basis within the sewer return.

There have been no exceedances to the specified limits at any time during these tests. The highest recorded reading for each parameter was reported in the sewer return each quarter throughout 2024.

Table 2 below provides the annual performance for water & energy consumption for the site. Site usage of energy decreased from 45.09 to 28.19 MWh, meaning that we have successfully exceeded our target to reduce overall usage by 5%.

Solar panels were commissioned at the site during 2023. The biomass boiler which had been previously installed in one of the site buildings has been relocated to another business site.

Table 2

Performance Parameters		
Parameter	Frequency of Assessment	Consumption
Water Usage	Annually	338m <sup>3</sup>
Energy Usage	Annually	28.19 MWh

Table 3 below provides the annual discharge volumes split into quarters. The discharge is monitored by a flow meter installed on site. The Flow Meter is approved by SIRA and is regularly inspected and calibrated. The last site inspection was in May 2023, the next is due in April 2028.

The flow is within the discharge consent volumes as provided by DWR Cymru Welsh Water.

Table 3

Discharge Volume	
Quarter 1	2,304 m <sup>3</sup>
Quarter 2	1,693 m <sup>3</sup>
Quarter 3	2,461 m <sup>3</sup>
Quarter 4	3,064 m <sup>3</sup>
<b>Total</b>	<b>9,522 m<sup>3</sup></b>

The discharge volume has increased slightly from the previous year, when we discharged a total of 9,200m<sup>3</sup>. The total raw materials used increased from 10,019.27 tonnes in 2023 to 10,539.83 tonnes in 2024.

Fugitive and static emissions are monitored throughout the year. There have been no environmental incidents or complaints over the past 12 months.

We recognise the environmental impact of our business and are dedicated to protecting our local and global environment through responsible management.