Permit Number: ZP3334AQ Operator: Slicker Recycling Limited

Facility: Newport Oil Treatment Plant Form Number: Water1 / 09/08/2021

Reporting of emissions to water (other than to sewer) and land for the period from 01/01/2024 to 31/12/2024

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
W1	Total suspended solids	60 mg/l	For 95% of all measured values of periodic samples taken over one month	Min <1mg/l Ave 10.5mg/l [5] Max 86 mg/l [7]	BS EN 872	Weekly	Note 4
W1	Oil & Grease	No Visible Trace	Weekly [6]	No gross contamination [6]	Visual	Weekly [6]	

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference, number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases, the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

[5] Operator Comment: The Slicker Recycling reported average was for 100% of the weekly samples taken in 2024, where <1mg/l results (i.e. below detection limits) were conservatively assumed to be 5mg/l for the average calculation purposes.

[6] Operator Comment: As raised with NRW on multiple occasions (verbally and in writing) during 2022 and 2023, the W1 location stated on the ERP issued in 2022 is not physically accessible and not practical due to it being located on third party land owned by the local council. Slicker Recycling however complete weekly inspections of each catch pot / drainage grate on site to confirm that there is no gross oil contamination of oil build ups (greater than a skim of oil), as well as monthly pump outs of each catch pot. Modifications to the W1 location point to move it to an onsite location are being prepared as part of the permit variation to be submitted Q1 2025 to Natural Resources Wales.

[7] Operator Comment: Only one sample (of 55 taken) exceeded the 60mg/l threshold. This was believed to be a spurious sample.

Signed ……[redacted] Date…31st Jan 2025……..

(Authorised to sign as representative of Operator)

Permit Number:	ZP3334AQ	Operator:	Slicker Recycling Limited
Facility:	Newport Oil Treatment Plant	Form Number:	WaterUsage1 / 29/10/2007

Reporting of Water Usage for the year 2024

Water Source	Usage (m^3/year)	Specific Usage (m^3/unit output)
Mains water	2,138	0.450
Site borehole	N/A	N/A
River abstraction	N/A	N/A
TOTAL WATER USAGE	2,138	0.450

Operator's comments:
The Newport site does not have any water sourced from either river abstraction or borehole abstraction.
Specific usage based on a value of 4,752 tons of waste oil dispatched for the period.
Mains water usage was significantly higher than previous years, which was due to a leak identified on site, which was managed in communication with the water regulator for site (Dwr Cymru Welsh Water).

Signed [redacted]..... Date…31st Jan 2025.....
(Authorised to sign as representative of Operator)

Permit Number: ZP3334AQ Operator: Slicker Recycling Limited

Facility: Newport Oil Treatment Plant Form Number: Energy1 / 29/10/2007

Reporting of Energy Usage for the year 2024

Energy Source	Energy Usage Quantity	Primary Energy (MWh)	Specific Usage (MWh/unit output)
Electricity *	MWh	22.292	0.0047
Natural Gas	MWh	N/A	
Gas Oil	tonnes	40.2	0.0085
Recovered Fuel Oil	tonnes	N/A	
TOTAL	-	See above – Mismatch in units	See above – Mismatch in units

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments:
The site does not have a Natural Gas supply.
The site does not use Recovered Fuel Oil.
Gas Oil – Kerosine used by the site boiler was 49,000 litres or 40.2 tonnes using an assumed SG conversion of 0.82.
Specific usage based on a value of 4,751 tons of waste oil dispatched for the period.

Signed [redacted]…… Date…31st Jan 2025……..

(Authorised to sign as representative of Operator)

Permit Number: ZP3334AQ Operator: Slicker Recycling Limited

Facility: Newport Oil Treatment Plant Form Number: Air1 / effective from 17/08/2022

Reporting of emissions to air for the period from 01/01/2024 to 30/06/2024

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
C1	TVOCs[5]	30mg/Nm^3	Periodic	1.33	EN 12619	20th June 2024	+/-1.31
C2	TVOCs[5]	30mg/Nm^3	Periodic	[8]	EN 12619		
E1	TVOCs[5]	30mg/Nm^3	Periodic	0.75	EN 12619	20th June 2024	+/-1.31
F1	TVOCs[5]	30mg/Nm^3	Periodic	0.91	EN 12619	20th June 2024	+/-0.22
P1	TVOCs[5]	30mg/Nm^3	Periodic	4,948 [11]	EN 12619	9th July 2024	+/-163
P2	TVOCs[5]	30mg/Nm^3	Periodic	1,739 [11]	EN 12619	9th July 2024	+/-26.1
P3	TVOCs[5]	30mg/Nm^3	Periodic	3,903 [11]	EN 12619	9th July 2024	+/-50.74
P4	TVOCs[5]	30mg/Nm^3	Periodic	542 [11]	EN 12619	9th July 2024	+/-14.63
P5	TVOCs[5]	30mg/Nm^3	Periodic	1,311 [11]	EN 12619	9th July 2024	+/-20.98
P6	TVOCs[5]	30mg/Nm^3	Periodic	166 [11]	EN 12619	9th July 2024	+/-13.1
P7	TVOCs[5]	30mg/Nm^3	Periodic	1,212 [11]	EN 12619	9th July 2024	+/-19.4
S1	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S2	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S3	TVOCs[5]	30mg/Nm^3	Periodic	124 [10]	EN 12619	20th June 2024	+/-13.0
S4	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S5	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619		
S6	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S7	TVOCs[5]	30mg/Nm^3	Periodic	2,634 [11]	EN 12619	9th July 2024	+/-37.0
S8	TVOCs[5]	30mg/Nm^3	Periodic	[9]	EN 12619		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S9	TVOCs[5]	30mg/Nm^3	Periodic	257	EN 12619	20th June 2024	14
RS1	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
RS2	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
RS3	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
99	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

[5] Note 1 The BAT-AEL does not apply when the emission load is below 2 kg/h at the emission point provided that no CMR substances are identified as relevant in the waste gas stream, following completion of the waste water inventory required by BAT 3 of the Waste Treatment BREF Document (EU 2018), to be provided as part response to IC11 by the operator.

[6] Operator Comment: These tanks have been out of service for the entire reporting period, awaiting repairs. No testing completed.

[7] Operator Comment: These tanks were demolished in Q2 2024, as per the letter sent to NRW on 20th June 2024. Slicker Recycling are looking to remove these tanks from the permit in the permit variation to be submitted Q1 2025 to Natural Resources Wales.

[8] Operator Comment: Tank C2 not sampled due to health and safety concerns / issues related to vent point access. Tank C2 is on an identical duty to S7 and S8, namely used lubricating oil (ULO) at ambient temperature and pressure.

[9] Operator Comment: Tank S8 is on an identical duty to tank S7, namely used lubricating oil (ULO) at ambient temperature and pressure. Tank S8 was not tested by SOCOTEC, due to time constraints and identical nature of S7 (tested) and S8.

[10] Operator Comment: Slicker Recycling have raised verbally and in writing concerns related to the VOC limits imposed in the site permit and that the limits are not consistent with the revised Best Available Techniques (BAT) Reference Documents (BREF) for Waste Treatment. In the letter dated 16th November 2022, Slicker Recycling provided a detailed explanation on how the site was operating below the 2.0 kg/hr VOC exemption threshold, as set out in Table 6.9 of the BAT Conclusions. Included in the letter dated 16th November 2022, Slicker Recycling provided a detailed emissions calculation of the site, using actual 2021 site operational data for the Newport site, as well as using both the Industry wide generated (and Environment Agency accepted) Enviro-Lex air emissions data from 2006. The emissions work completed by Slicker Recycling, as detailed in the table above, correlates and supports the validity of the Enviro-Lex Report from 2006, thereby validating the emissions calculation provided to Natural Resources Wales on 16th February 2022. To date Slicker Recycling have received no written response to the letter dated 16th November 2022 (including the associated emissions calculation) and Slicker Recycling maintain that the Newport Facility is fully operational and compliant to the BAT-AELs, as set out in the BREF Documents and that the limits imposed in the permit continue to contradict the guidance set out in the BAT BREF documents. Further to this, Slicker Recycling have also provided Natural Resources Wales an updated H1 Assessment in 2024, which shows that these emissions are of no significance. Slicker Recycling will seek to remove these emission testing requirements, as part of the permit variation to be submitted Q1 2025 to Natural Resources Wales.
[11] All reported results from the 9th July 2024 were abnormally high. Further investigation several months later by SOCOTEC found the equipment used on the day to be faulty, so results believed to be false.

Signed ……[redacted]……. Date…31st Jan 2025……..
(Authorised to sign as representative of Operator)

Permit Number: ZP3334AQ Operator: Slicker Recycling Limited

Facility: Newport Oil Treatment Plant Form Number: Air1 / effective from 17/08/2022

Reporting of emissions to air for the period from 01/07/2024 to 31/12/2024

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
C1	TVOCs[5]	30mg/Nm^3	Periodic	1.40	EN 12619	17th Oct 2024	+/-1.3
C2	TVOCs[5]	30mg/Nm^3	Periodic	[8]	EN 12619		
E1	TVOCs[5]	30mg/Nm^3	Periodic	177	EN 12619	18th Oct 2024	+/-2.8
F1	TVOCs[5]	30mg/Nm^3	Periodic	1.40	EN 12619	17th Oct 2024	+/-1.3
P1	TVOCs[5]	30mg/Nm^3	Periodic	6,087	EN 12619	17th Oct 2024	+/-79
P2	TVOCs[5]	30mg/Nm^3	Periodic	3,449	EN 12619	17th Oct 2024	+/-45
P3	TVOCs[5]	30mg/Nm^3	Periodic	1,372	EN 12619	17th Oct 2024	+/-18
P4	TVOCs[5]	30mg/Nm^3	Periodic	161	EN 12619	17th Oct 2024	+/-2.6
P5	TVOCs[5]	30mg/Nm^3	Periodic	596	EN 12619	17th Oct 2024	+/-8.3
P6	TVOCs[5]	30mg/Nm^3	Periodic	233	EN 12619	17th Oct 2024	+/-3.5
P7	TVOCs[5]	30mg/Nm^3	Periodic	1,054	EN 12619	17th Oct 2024	+/-13.7
S1	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S2	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S3	TVOCs[5]	30mg/Nm^3	Periodic	1,706	EN 12619	18th Oct 2024	+/-23.9
S4	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S5	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S6	TVOCs[5]	30mg/Nm^3	Periodic	Out of service [6]	EN 12619	N/A	
S7	TVOCs[5]	30mg/Nm^3	Periodic	482	EN 12619	17th Oct 2024	+/-6.3
S8	TVOCs[5]	30mg/Nm^3	Periodic	[9]	EN 12619		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S9	TVOCs[5]	30mg/Nm^3	Periodic	648	EN 12619	17th Oct 2024	+/-8.4
RS1	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
RS2	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
RS3	TVOCs[5]	30mg/Nm^3	Periodic	Demolished [7]	EN 12619	N/A	
99	TVOCs[5]	30mg/Nm^3	Periodic	Demilished [7]	EN 12619	N/A	

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

[5] Note 1 The BAT-AEL does not apply when the emission load is below 2 kg/h at the emission point provided that no CMR substances are identified as relevant in the waste gas stream, following completion of the waste water inventory required by BAT 3 of the Waste Treatment BREF Document (EU 2018), to be provided as part response to IC11 by the operator.

[6] Operator Comment: These tanks have been out of service for the entire reporting period, awaiting repairs. No testing completed.

[7] Operator Comment: These tanks were demolished in Q2 2024, as per the letter sent to NRW on 20th June 2024. Slicker Recycling are looking to remove these tanks from the permit in the permit variation to be submitted Q1 2025 to Natural Resources Wales.

[8] Operator Comment: Tank C2 not sampled due to health and safety concerns / issues related to vent point access. Tank C2 is on an identical duty to S7 and S8, namely used lubricating oil (ULO) at ambient temperature and pressure.

[9] Operator Comment: Tank S8 is on an identical duty to tank S7, namely used lubricating oil (ULO) at ambient temperature and pressure. Tank S8 was not tested by SOCOTEC, due to time constraints and identical nature of S7 (tested) and S8.

[10] Operator Comment: Slicker Recycling have raised verbally and in writing concerns related to the VOC limits imposed in the site permit and that the limits are not consistent with the revised Best Available Techniques (BAT) Reference Documents (BREF) for Waste Treatment. In the letter dated 16th November 2022, Slicker Recycling provided a detailed explanation on how the site was operating below the 2.0 kg/hr VOC exemption threshold, as set out in Table 6.9 of the BAT Conclusions. Included in the letter dated 16th November 2022, Slicker Recycling provided a detailed emissions calculation of the site, using actual 2021 site operational data for the Newport site, as well as using both the Industry wide generated (and Environment Agency accepted) Enviro-Lex air emissions data from 2006. The emissions work completed by Slicker Recycling, as detailed in the table above, correlates and supports the validity of the Enviro-Lex Report from 2006, thereby validating the emissions calculation provided to Natural Resources Wales on 16th February 2022. To date Slicker Recycling have received no written response to the letter dated 16th November 2022 (including the associated emissions calculation) and Slicker Recycling maintain that the Newport Facility is fully operational and compliant to the BAT-AELs, as set out in the BREF Documents and that the limits imposed in the permit continue to contradict the guidance set out in the BAT BREF documents. Further to this, Slicker Recycling have also provided Natural Resources Wales an updated H1 Assessment in 2024, which shows that these emissions are of no significance. Slicker Recycling will seek to remove these emission testing requirements, as part of the permit variation to be submitted Q1 2025 to Natural Resources Wales.

Signed ……[redacted] Date…31st Jan 2025……..

(Authorised to sign as representative of Operator)

Permit Number: ZP3334AQ Operator: Slicker Recycling Limited

Facility: Newport Oil Treatment Plant Form Number: Sewer1 / effective from 17/08/2022

Reporting of emissions to sewer for the period from 01/01/2024 to 31/12/2024

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S1	Flow	None set	~~Daily average per calendar month~~ Total discharged during month Note 5: Discharges are batch discharges and not continuous as implied by permit	274 m3 (total) 299 m3 (total) 144 m3 (total) 462 m3 (total) 195 m3 (total) 108 m3 (total) 99 m3 (total) 110 m3 (total) 47 m3 (total) 310 m3 (total) [8] 327 m3 (total) 225 m3 (total) **2,600 m3 (total)**	Flow meter	01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024 **Annual Total**	Note 4, 5
S1	Hydrocarbon oil index (HOI) (1)(2)	10 mg/l Note 6	Once every monthly	Note 6 11.02 mg/l 32.93 mg/l 7.34 mg/l 9.23 mg/l 9.95 mg/l 7.02 mg/l 43.85 mg/l 42.83 mg/l 1.24 mg/l 9.68 mg/l 20.74 mg/l 142.96 mg/l	Note 7 ~~EN ISO 9377-2~~ EPH by TM5/TM16/TM30 Tested by Element	01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <10ug/l

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S1	Arsenic (As)(1)(2)	0.05 mg/l	Once every monthly	0.0142 mg/l 0.0187 mg/l 0.0103 mg/l 0.0085 mg/l 0.0167 mg/l 0.0253 mg/l 0.0105 mg/l 0.0126 mg/l <0.0025 mg/l <0.0025 mg/l 0.0115 mg/l <0.0231 mg/l	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <2.5 ug/l
S1	Cadmium (Cd) (1)(2)	0.05 mg/l	Once every monthly	<0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l <0.0005 mg/l		01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <0.5ug/l
S1	Chromium (Cr) (1)(2)	0.15 mg/l	Once every monthly	Note 6 0.0031 mg/l 0.0057 mg/l 0.0025 mg/l 0.0017 mg/l 0.0063 mg/l 0.0064 mg/l 0.0076 mg/l 0.0073 mg/l <0.0015 mg/l 0.0021 mg/l 0.0028 mg/l 0.0040 mg/l		 01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <1.5ug/l

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S1	Copper (Cu) (1)(2)	0.5 mg/l	Once every monthly	0.015 mg/l 0.019 mg/l 0.013 mg/l 0.016 mg/l 0.017 mg/l 0.027 mg/l 0.026 mg/l 0.017 mg/l 0.010 mg/l 0.021 mg/l 0.026 mg/l 0.069 mg/l		01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <7.0ug/l
S1	Nickel (Ni) (1)(2)	0.5 mg/l	Once every monthly	Note 6 0.015 mg/l 0.022 mg/l 0.011 mg/l 0.017 mg/l 0.042 mg/l 0.031 mg/l 0.037 mg/l 0.028 mg/l 0.015 mg/l 0.017 mg/l 0.019 mg/l 0.058 mg/l		Note 6 01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <1.0ug/l
S1	Lead (Pb) (1)(2)	0.1 mg/l	Once every monthly	0.011 mg/l <0.005 mg/l 0.013 mg/l 0.014 mg/l 0.016 mg/l 0.029 mg/l 0.030 mg/l <0.005 mg/l <0.005 mg/l 0.010 mg/l 0.018 mg/l 0.012 mg/l		01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <5.0ug/l

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
S1	Zinc (Zn) (1)(2)	1 mg/l	Once every monthly	Note 6 1.560 mg/l 1.692 mg/l 0.873 mg/l 1.133 mg/l 3.740 mg/l 2.858 mg/l 3.087 mg/l 1.736 mg/l 0.091 mg/l 0.771 mg/l 1.498 mg/l 1.998 mg/l		01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <3.0ug/l
S1	Mercury and its compounds, expressed as mercury (Total Hg) (1)(2)	5µg/l	~~24 hour flow proportional sample~~ Once every monthly Note 5: Discharges are batch discharges and <u>not continuous</u> as implied by permit	<0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l <0.001 mg/l	Various EN standards available (i.e. EN ISO 17852, EN ISO 12846)	01-2024 02-2024 03-2024 04-2024 05-2024 06-2024 07-2024 08-2024 09-2024 10-2024 11-2024 12-2024	LOD <1.0ug/l
S1	PFOA(1)(2)	None set	Once every 6 months	<0.05 ug/l <0.05 ug/l	No EN standard available	Composite of 01-2024 to 06-2024 07-2024 to 12-2024	LOD <0.05ug/l
S1	PFOS(1)(2)	None set	Once every 6 months	<0.05 ug/l <0.05 ug/l	No EN standard available	Composite of 01-2024 to 06-2024 07-2024 to 12-2024	LOD <0.05ug/l

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference, number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases, the principal technique is stated, for example gas chromatography.
[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Operator Comments

[5] The permit for the site implies a continuous effluent flow to the Nash Water Treatment Works, which is not the case. The discharge through S1 is a batch discharge of effluent, whereby effluent is only discharged to the Nash Facility once the operator and regulator (i.e. Dwr Cymru Welsh Water) has given the site clearance to discharge against the limits set in the site's Trade Effluent Consent, as issued under the Water Industries Act 1991 (as amended in 1999 and 2003).

[6] Slicker Recycling discharge, under a Trade Effluent Consent, to the Nash Water Treatment works, as operated by Dwr Cymru Welsh Water. All discharges from site for the reporting period have been compliant against the Trade Effluent Consent for the site, as water samples are collected and tested by Dwr Cymru Welsh Water prior to discharge. Slicker Recycling have spoken to and written to Natural Resources Wales on a number of occasions regarding the effluent discharge discrepancy between the Trade Effluent Discharge Consent (as regulated by Dwr Cymru Welsh Water) and the ERP issued against the site by Natural Resources Wales. Notably, Slicker Recycling have even provided Natural Resources Wales an updated H1 Assessment for the site and sent a further communication to Natural Resources Wales throughout 2023 and 2024, which included independent third party laboratory analysis data, communications with Dwr Cymru Welsh Water, a copy of the Trade Effluent Consent and another copy of the H1 Assessment. From the evidence provided, Slicker Recycling firmly maintain that the limits set in the ERP are not contradictory to what is in place under the Trade Effluent Consent issued against the site under the Water Industries Act and Slicker Recycling have done everything in their view to demonstrate that the trade effluent discharges from the site are insignificant to the operation of the Nash Water Treatment Works and their eventual discharge to the River Usk. Under the Water Industries Act, Slicekr Recycling consider Dwr Cymru Welsh Water to be the regulator of this stream, unless Natural Resources Wales explicitly state in writing that they are overriding the Water Industries Act. Slicker Recycling will seek to remove these emission testing requirements, as part of the permit variation to be submitted Q1 2025 to Natural Resources Wales

[7] Slicker Recycling have not been able to locate a laboratory that test for HOI against EN ISO 9377-2. As per the letter dated 20th September 2023, the third party laboratory (Element Minerals Technology) used by Slicker Recycling have completed testing against Extractable Petroleum Hydrocarbon (EPH) analysis, which Slicker Recycling have been advised is a good comparator to HOI. No response the letter sent on 20th September 2023 has been received by Slicker Recycling from Natural Resources Wales.

[8] Meter issues developed in October 2024, resulting in unreliable readings. Water Regulator (Dwr Cymru Welsh Water) notified and repair put in place. Discharge for that month assumed to be 310m^3 (i.e. 10m^3 per day) for the purpose of this document.

Signed …… [redacted] Date…31st Jan 2025……..

(Authorised to sign as representative of Operator)

Permit Number:	ZP3334AQ	Operator:	Slicker Recycling Limited
Facility:	Newport Oil Treatment Plant	Form Number:	Performance1 / effective from 17/08/2022

Reporting of other performance indicators for the period 01/01/2024 to 31/12/2024

Parameter	Value	Units
Waste oil dispatched	4,752	tonnes
Oily rags etc treated as part of A5 activity listed in Table S1.1	<5 – See comments	tonnes
Total raw material used	6.8	tonnes
Generation of residue waste	N/A	tonnes
Generation of waste water	2,138	m^3

Operator's comments:
Oily Rags – Minimal onsite treatment (washing) of oil rags completed for internal onsite use only.
Raw Material – Very minimal raw material used on site for all treatment activities – 3.6 tonnes of caustic solution used for effluent pH treatment, circa 3.2 tonnes (3,000lt at SG 1.06) of demulsification chemicals used for oil treatment. Diesel for the site FLT assumed de minimis.
Waste water generation – The largest waste user on site is the site steam boiler. Conservatively, all potable water received on site is assumed to ultimately become waste water.
Residue waste generation – None generated, due to the site not processing waste into fuels.

Signed ……[redacted]…… Date…31st Jan 2025……..
(Authorised to sign as representative of Operator)