

Our Ref : EPR-BL4567IZ / CAR_NRW0050353

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Company Number: 00137114

Date: 22/05/2026

Dear, Mr De Filippo

Natural Resources Wales (NRW) conducted an Operator Monitoring Assessment (OMA) for discharges to water at the Vale Nickel refinery on the 10th of September 2025.

The OMA (reference CAR_NRW0050353) identified that the analysis method used by the operator to determine ammonia concentration in the permitted discharge did not conform with the methods specified in Table S3.2 of the environmental permit.

The operator in-house laboratory uses the International Accredited standard ASTM D1426-08, a manual spectrometric method, for the determination of ammonium. However, the environmental permit stipulates the use of ISO5664 / BS 6068-2.7 – *Water quality: determination of ammonium - distillation and titration method as the preferred method*.

Following the OMA visit, NRW requested that the operator either:

- i. Perform analysis in line with the approved method stated in the environmental permit
- or
- ii. Submit a request to NRW, including valid justification for the continued use of the currently used manual spectrometric method. The request must be supported by reference to appropriate technical guidance.

On the 31st March 2026 the operator submitted the following document for NRW review:

- Vale Europe Ltd – OMA – QA Lab – Method for testing Ammonia – 31.03.26.pdf

NRW has reviewed Vale's justification and supporting evidence for the continued use of the spectrometric analysis method for ammonia.

The operator has provided sufficient justification, including a comparison the suitability limits of detection, analytical ranges, and associated uncertainty.

The GOV.UK “Monitoring discharges to water” guidance (formerly M18) recognises manual spectrometry as an appropriate method for the analysis of ammonia in industrial effluent.

NRW is therefore satisfied with the operator’s continued use of the internationally accredited ASTM D1426-08 manual spectrometric method for the determination of ammonium.

Please note, the operator must ensure that any future variation to Environmental Permit EPR-BL4567IZ incorporates this approved monitoring method within Table S3.2.

Yours sincerely

A handwritten signature in black ink that reads "E Jones". The letter "E" is stylized with a long horizontal stroke that extends to the left.

Elliot L T Jones
Senior Officer SW Industry regulation

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Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.