

Natural Resources Wales permitting decisions

Befesa Salt Slags Limited Whitchurch Salt Slags Decision Document

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Permit Variation

The permit variation number is: [EPR/VP3030BX/V007](#)

The operator is: [Befesa Salt Slags Limited](#)

The Installation is located at: [Whitchurch Salt Slags, Fenn's Bank, Whitchurch](#)

We have decided to issue the variation for Whitchurch Salt Slags operated by Befesa Salt Slags Limited. We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

The permit is for an installation for the primary purpose of the production of aluminium oxide. The minor technical variation applied for is to:

Add the allowance to process dust from the milling of the following wastes codes within the chemical treatment plant:

- EWC 10 03 29* - wastes from treatment of salt slags and black drosses containing hazardous substances
- EWC 10 03 30 - wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29*

The addition of waste code EWC 10 03 16 skimmings other than those mentioned in 10 03 15*, to the permit for the following activities; Storage, Repackaging, and Chemical Processing.

An increase in the maximum permitted quantity of dross for storage from 3,000 tonnes per day to 4,500 tonnes per day.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

Receipt of application

Consultation

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements. Consultation is not routinely carried out on minor technical variations.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view on our online public register.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

Listed Activities

- **Section 4.2 Part A(1)(a)(v)** *Producing inorganic chemicals such as non-metals, metal oxides, metal carbonyls, or other inorganic compounds (such as calcium carbide, silicon, silicon carbide, titanium oxide).*
Producing ammonium sulphate, sodium and potassium chlorides and aluminium oxides recovered from aluminium salt slag and spent pot liners from the aluminium industry. Chemical Plants 1 and 2.
- **Section 5.3 Part A(1)(a)(v)** *Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds.*
Recovery of Spent Pot liner Cut 1 by milling prior to shipping off site, and Spent Pot liner cut 1 and 2 by milling prior to treatment in the on-site chemical plant.
- **Section 5.6 Part A(1)(a)** *Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Section 5.1,*

5.2, 5.3 and paragraph (b) of this section, except (i) temporary storage, pending collection, on the site where the waste is generated or (ii) activities falling within Section 5.2.

Storage of dross, salt slag and spent pot liner prior to on-site processing.

- **Section 3.5 Part B(a)** *The crushing, grinding or other size reduction, other than the cutting of stone, or the grading, screening or heating of any designated mineral or mineral product.*

Separation of aluminium from dross by milling:

Milling of foundry sand;

Separation of aluminium from slag by milling;

R4: Recycling/reclamation of metals and metal compounds.

- **Section 5.3 Part A(1)(a)(iv)** *Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging prior to submission to any of the other activities listed in this Section or in Section 5.1.*

Repackaging prior to submission to another S5.3 activity.

- **Section 4.3 Part A(1)(a)** *Producing (including any blending which is related to their production) phosphorus-, nitrogen- or potassium- based fertilisers (simple or compound fertilisers).*

Manufacture of urea/ammonium sulphate fertiliser.

Directly Associated Activities

- **Boiler plant**

LPG or kerosene fuelled 6.5MW thermal input

- **Storage of non-hazardous materials**

Receipt and storage of non-hazardous wastes for processing

- **Storage of raw materials**

Storage of raw materials in the Wardle Shed

The regulated facility also conducts the following recovery and disposal waste operations:

- Recovery of non-hazardous SPL Cut 1 (EWC code 16 11 04) by milling prior to shipping off site.
- D14 – Repackaging prior to submission to any operations numbered D1 to D13
D15 – Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
R12 – Exchange of wastes for submission to any of the operations R1 to R11
R13 – Storage of wastes pending any of the operations R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).
Bulking up of untreated dross prior to removal from site for processing elsewhere.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

All applicable European directives have been considered in the determination of the application.

The site

The operator has previously provided a plan which we consider is satisfactory, showing the extent of the site of the facility, no new land is being added or removed from the permit boundary with this application.

A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

Site condition report

As no new land is being added or removed from the permit boundary a site condition report was not required.

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. A full

habitats assessment was carried out as part of the previous variation application.

The risk assessment completed with this application has identified no additional negative affect on features of the local designated sites. We consider that this application will not affect the features of the local site/species/habitat.

Environmental Risk Assessment

Air

There are no new emissions to air associated with this permit variation. The applicant has previously assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health.

The previous air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e. the maximum permitted emission rate.

We are in agreement with this approach. The assumptions underpinning the model have been checked and are reasonably precautionary. The way in which the Applicant used dispersion models, its selection of input data, use of background data and the assumptions it made have been reviewed by Natural Resources Wales modelling specialists to establish the robustness of the Applicant's air impact assessment. The output from the model has then been used to inform further assessment of health impacts.

We are therefore satisfied that the proposed variation will not have an adverse effect on air.

Water and soil

The applicant has not proposed any emissions to water or to land as part of this variation, nor are there any increased risks to water or soil identified within the submitted risk assessment.

We are therefore satisfied that the proposed variation incorporates sufficient measures to protect soil and groundwater from adverse effect.

Odour

The applicant has previously submitted an odour management plan and conducted detailed quantitative assessment of odour dispersion from the site as part of previous applications. As part of this application the applicant has conducted a risk assessment which identifies likely sources of odour from the site; sensitive receptors and methods for mitigating any risks of odour. There are no proposed increases to odour emissions from the site as part of this application.

We are satisfied that the proposed variation will not have an adverse effect on odour emissions from the installation.

Noise

The applicant has identified the major potential sources of noise as part of the submitted noise risk assessment. A potential minimal increase in the number of delivery vehicles to the site within the permitted times and quantities has been identified.

The applicant has provided mitigation measures as part of this assessment to manage the noise increase; deliveries will be relatively infrequent, all delivery vehicles will be specialist tankers that comply with road-going noise standards, reversing beepers conform to the HSE requirements, and the storage tank is located on the opposite side of the building to the nearest receptors. We are therefore satisfied that the proposed changes will not have an adverse effect on noise emissions from the installation.

Fugitive emissions

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Monitoring

Existing monitoring requirements remain unchanged and should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

Reporting

Reporting requirements are set out in the previous version of the permit and remain unchanged.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. There are no changes to the plant processes or procedures associated with this variation application. Therefore we are satisfied that Operating Techniques included in the permit reflect the appropriate measures to minimise pollution.

The permit conditions

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility in Schedule 2.

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

Environment management system

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

OPRA

The OPRA score at permit issue is 192.

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