Cyfoeth Naturiol Cymru
Natural Resources Wales

Natural Resources Wales permitting decisions

ALUK (GB) Limited

Chepstow Aluminium Treatment Plant Decision Document

Contents

New bespoke permit

The application number is: PAN-007607

The applicant / operator is: ALUK (GB) Limited

The Installation is located at: Chepstow Aluminium Treatment Plant, Newhouse Farm Industrial Estate, Chepstow, NP16 6UD

We have decided to grant the permit for Chepstow Aluminium Treatment Plant, Newhouse Farm Industrial Estate, Chepstow, NP16 6UD operated by ALUK (GB) 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.

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
- justifies the specific conditions in the permit other than those in our generic permit template.

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

Key issues of the decision

Receipt of application

Confidential information

No claim for commercial or industrial confidentiality has been made. We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

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.

A copy of the application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have "Working Together Agreements":

- **Health and Safety Executive**
- **Public Health Wales**
- **Food Standards Agency**
- **Monmouthshire County Council**
- **Dŵr Cymru**

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started on **16/03/2020** and ended on **14/04/2020.** An advert was also placed on our website.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 2. We have taken all relevant representations into consideration in reaching our determination.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.

The facility

The extent/nature of the facilities taking place at the site required clarification.
The decision on the facility was taken in accordance with RGN 2 Understanding the meaning of regulated 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.

- Section 2.3: Surface treating metals and plastics – Part A(1)(a) Unless falling within Part A(2) of this Section, surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30 m^3
- Section 5.4: Disposal recovery or a mix of disposal and recovery of non-hazardous waste – Part A(1)(a)(ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities, and excluding activities covered in Council Directive 91/271/EEC concerning urban waste-water treatment – (ii) physico-chemical treatment
- Section 6.4: Coating activities, printing and textile treatments – Part (B)(a)(i) Any process (other than for the painting or re-spraying of, or parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or any other volatile organic compound and is likely to involve the use in any 12-month period of 20 or more tonnes of printing ink, paint or any other coating materials which is applied in solid form.

- Directly Associated Activity – Three <1 MW thermal input (aggregated) natural gas boilers used for process heating not within scope of Medium Combustion Plant Directive

The are no activities within scope of the Schedule 14 of Environmental Permitting Regulations: Solvent emissions activities.

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 provided a plan which we consider is satisfactory, showing the extent of the site of the facility and including all emission points. Confirmation was required on the emission point of the sewer discharge and of the uncontaminated surface water drainage system and emission point(s). The monitoring point of the sewer discharge is different to the emission point into the public foul sewer, both points have been marked on the site plan.

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

The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5). The site condition report has been completed following the site condition report template and is supplemented with a phase 1 desk study assessment and phase 2 geo-environmental and geo-technical assessment. Both these assessments took place in 2016 when the current industrial

facility was already built, the phase 2 assessment involved a full intrusive sampling survey of groundwater and soil. All samples apart from one were below relevant thresholds. One soil sample showed marginally elevated levels of benzo(a)pyrene, benzo(b)fluranthene and dibenzo(a,h)anthracene, however is considered to be at a level which is unlikely to present a significant risk. Therefore, no significant contamination was identified to be present at the site based on the desktop review and the ground investigation studies completed.

Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of multiple sites of nature conservation. A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of any of the sites listed below.

The following Natura 2000/Ramsar sites are located within 10 km of the installation:

- SAC UK0013030 / SPA UK9015022 / Ramsar UK11081 Severn Estuary (England & Wales)
- SAC River Wye UK0012642 (England & Wales)
- SAC Wye Valley Woodland UK0012727 (England & Wales)
- SAC Wye Valley and Forest of Dean Bat Sites UK0014794 (England & Wales)

An OGN 200 Form 1 (Habitats Regulation Assessment) was completed to assess the potential to affect the Natura 2000/Ramsar sites, this is available on the public register. The assessment concluded the installation is not likely to have a significant effect on any of the Natura 2000/Ramsar sites. The assessment was reviewed by an NRW conservation technical specialist who confirmed agreement with the conclusion. The assessment was also sent to Natural England for consultation, no response was received.

The following Sites of Special Scientific Interest (SSSI) are located within 2 km of the installation:

- SSSI Severn Estuary 33WGX (England & Wales)
- SSSI River Wye (Lower Wye) 33WEB (England & Wales)

- SSSI Pennsylvania Fields Sedbury (England)

An Appendix 4 Form (CRoW Act Assessment) was completed to assess the potential to effect the SSSI sites, this is available on the public register. The assessment concluded the installation is not likely to damage any of the features of any of the SSSI sites. The assessment was reviewed by an NRW conservation technical specialist who confirmed agreement with the conclusion. The assessment was also sent to Natural England for consultation, no response was received.

There are several non-statutory Local Wildlife Sites, National Nature Reserves, Local Nature Reserves and Ancient Woodlands located within 2 km of the installation. In line with NRW guidance, for non-statutory sites assessment criteria considers whether an installation can cause significant pollution. If the process contribution for each pollutant is less than 100 % of the critical level of load we consider no significant pollution will be caused. The applicant screened for non-statutory sites within 2 km of the installation and included these sites in their air dispersion modelling report. Among all the non-statutory sites assessed the highest process contributions were <100 % of the relevant critical levels or loads therefore the impacts on all the non-statutory sites can be considered insignificant.

Environmental Risk Assessment

Air

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stack and its impact on local air quality.

There are a total of seven emission points to air within the installation, two points are those that have been modelled below (A1 and A2). Three are stacks from three natural gas boilers providing heat to the process, these boilers aggregate to below 1 MW thermal input therefore not within scope of MCPD. The remaining two emission points are heat vents from ovens. Following advice from NRW internal air quality specialists the remaining five sources did not require assessment.

The Applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health. These assessments predict the potential effects on local air quality from the Installation's stack emission. The applicant completed detailed air dispersion modelling for all pollutants regardless of whether they screened out in the H1 tool assessment. The modelling was based on the installation operating continuously, 8760 hours per year which provides a conservative assessment, we are in agreement with this approach. The detailed air dispersion modelling was completed using three emissions scenarios:

(i) Emissions at the BAT-AELs (best available techniques – associated emissions levels)

(ii) Emissions at the proposed ELVs (emission limit values) – these are lower than the BAT-AELs and higher than the actual emissions to allow for process variation

(iii) Emissions at the actual levels – the actual emissions were monitored during an emissions monitoring survey, they are considerably lower than the BAT-AELs

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 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.

The applicant has submitted detailed air dispersion modelling for the following pollutants: oxides of nitrogen (NOx), sulphur dioxide (SO_2), particulate matter, sulphuric acid mist, volatile organic carbon (VOCs) and hydrogen fluoride. An assumption that VOCs will be present as benzene was applied as a conservative approach.

The closest residential receptors are located approximately 300 m west of the installation boundary. There is an Air Quality Management Area (AQMA) located approximately 1.9 km from the installation site in Chepstow, this is designated for NOx

and was included in the assessment. The prevailing wind direction is generally from a westerly south-westerly direction, therefore blowing away from the closest residential receptors.

The applicant has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the installation boundary and all identified sensitive receptor locations. The modelling results for each pollutant will be discussed separately below.

Oxides of nitrogen (NOx)

A long term critical level of 40 µg/m^3 and short term critical level of 200 µg/m^3 was assumed for NOx. Including all three different emissions scenarios at sensitive receptor locations the maximum long-term PC was >1 % and the long-term PEC was <70 % of the long-term critical level. Therefore in accordance with NRW guidance the long-term impacts from NOx can be considered as insignificant. Including all three different emissions scenarios at sensitive receptor locations the maximum short-term PC was >10 % and the short-term PEC was <20 % of the short-term critical level minus twice the long-term background. Therefore in accordance with NRW guidance the short-term impacts from NOx can be considered insignificant. At the AQMA, the long-term PC was <1 % of the long-term critical level and the short-term PC was <10 % of the short-term critical level, therefore impacts of NOx on the AQMA are considered insignificant.

Sulphur dioxide (SO_2)

The short term critical levels of 125 µg/m^3 (24 hour), 350 µg/m^3 (1 hour) and 266 µg/m^3 (15 minute) were assumed for SO_2. Including all three different emissions scenarios at sensitive receptor locations the maximum short-term 24 hour PC was <10 % of the short-term 24 hour critical level. The maximum short-term 1 hour PC was <10 % of the short-term 1 hour critical level. The maximum short-term 15 minute PC was >10 % and PEC <20 % of the short-term 15 minute critical level. Therefore in accordance with NRW guidance the short-term impacts from SO_2 can be considered insignificant. The long-term impacts from SO_2 were considered in the assessment of conservation sites and shown to be insignificant in all three different emissions scenarios.

Particulate matter

The long term critical levels of 25 µg/m^3 (annual $PM_{2.5}$), 40 µg/m^3 (annual PM_{10}) and short term critical level of 50 µg/m^3 (24 hour PM_{10}) were assumed for particulate matter. Including all three different emissions scenarios at sensitive receptor locations the maximum long term PC for both $PM_{2.5}$ and PM_{10} was >1 % and PEC <70 % of the relevant long term critical level. The maximum short term PC was <10 % of the short term critical level. Therefore in accordance with NRW guidance the long-term impacts and short term impacts from particulate matter can be considered insignificant.

Sulphuric acid mist

The long term critical level of 10 µg/m^3 (annual) and short term critical level of 300 µg/m^3 (1 hour) were assumed for sulphuric acid mist. Including all three different emissions scenarios at sensitive receptor locations the maximum long term PC was <1 % of the long term critical level. The maximum short term PC was <10 % of the short term critical level. Therefore in accordance with NRW guidance the long-term impacts and short term impacts from sulphuric acid mist can be considered insignificant.

Volatile organic carbon (as benzene)

The long term critical level of 5 µg/m^3 (annual benzene) was assumed VOC (as benzene). Including all three different emissions scenarios at sensitive receptor locations the maximum long term PC was >1 % and PEC <70 % of the long term critical level. Therefore in accordance with NRW guidance the long-term impacts from VOC can be considered insignificant.

Hydrogen Fluoride

The long term critical level of 16 µg/m^3 (annual) and short term critical level of 160 µg/m^3 (1 hour) were assumed for hydrogen fluoride. Including all three different emissions scenarios at sensitive receptor locations the maximum long term PC was <1 % of the long term critical level. The maximum short term PC was <10 % of the short term critical level. Therefore in accordance with NRW guidance the long-term impacts and short term impacts from hydrogen fluoride can be considered insignificant.

Emission limits

We have decided that emission limits should be set for the parameters listed in the permit. The following substances have been identified as being emitted in substantial quantities and ELVs have been set for those substances identified by the BREF. The operator has proposed ELVs for all pollutants which for NOx, SO_2 and particulate matter are considerably lower than the BAT-AELs, demonstrating the process is achieving better than the BAT-AELs. We have set ELVs for the following pollutants in line with the ELVs proposed by the operator:

- NOx
- SO_2
- Particulate matter
- Hydrogen fluoride

We have decided not to set ELVs for the following pollutants as they are emitted in very low quantities and in addition are not identified in the BREF:

- Volatile organic carbon (VOCs)
- Sulphuric acid mist

Water

There is one discharge to foul sewer from the effluent treatment plant. All process rinse water and surface water from process areas is directed through the effluent treatment plant. A trade effluent discharge consent from Dŵr Cymru is in place for the sewer discharge and places limits on a number of parameters. The treated trade effluent is discharged into the Dŵr Cymru foul sewer network and undergoes treatment at Hunger Pill Sewage Treatment Works then discharge to the Severn Estuary.

Uncontaminated surface water is collected via multiple class I oil separators and directed to two unlined balancing lagoons. The two balancing lagoons discharge the uncontaminated surface water in a controlled manner to an existing watercourse, the Rhyne (ditch) which drains to the Severn Estuary.

The surface water drainage system meets the requirements set out in Guidance for Pollution Prevention including the Class 1 oil interceptors.

Emission limits

We have decided that emission limits for the sewer discharge should be set for the parameters listed in the permit, this decision has be made in accordance with 'How to comply with you environmental permit; Additional guidance for: The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07) (September 2014) and the limits contained within Dŵr Cymru Trade Effluent Discharge Consent. The following substances have been identified as being emitted in significant quantities and ELVs and/or equivalent parameters have been set for those substances and others. The following emission limit values have been set for the trade effluent discharge into the foul sewer:

- Aluminium: 2.0 mg/L
- pH: minimum value of 6, maximum value of 9

Soil

The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5). The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14 (1)(e) and 16(2) of the Industrial Emissions Directive. The operator will employ a monitoring survey for groundwater every five years and soil every 10 years through an external contractor. The site has been designed to minimise harmful releases of polluting substances to soil and groundwater through the use of concrete hardstanding in all process areas and parking facilities. All drainage from process areas is treated through the use of an effluent treatment plant. Surface water and foul drainage systems are completely separate. All surface water drainage from car and lorry parking areas is directed through class 1 oil separators in the surface water drainage system, through two balancing lagoons and discharged in a controlled manner to a Rhyne (ditch) which travels to the Severn Estuary.

Odour

As stated in the relevant BAT Reference Document (Surface Treatment of Metals and Plastics), odour is not a major factor for this industry. However, odour can be associated with some specific activities, particularly acid fumes. An odour risk assessment was completed following the H1 risk assessment methodology by the applicant and assessed by us. The closest sensitive human receptor is located approximately 350 m away to the west, the prevailing wind direction is away from the closest receptors. The most possible significant source of odour would be acid fumes arising from the process, primarily sulphuric acid fumes. A wet scrubber system in place to ensure any odorous emissions are dispersed adequately. In addition, a monitoring survey was carried out to measure the emissions of sulphuric acid fume, actual emissions are very small and therefore are not considered to be significant. The operator has stated a number of odour management techniques are employed including:

- Planned preventative maintenance program including the scrubber systems
- A pest control program is in operation
- All wastes are stored in sealed containers
- External doors and windows are kept shut

In conclusion, based upon the information in the application we are satisfied the appropriate measures are in place to prevent odour emissions.

Noise and Vibration

As stated in the relevant BAT Reference Document (Surface Treatment of Metals and Plastics), surface treatment is not a major noise emitting industry, however some specific activities do generate significant noise. A noise and vibration risk assessment has been completed following the H1 risk assessment methodology by the applicant and assessed by us. The closest sensitive human receptor is located over 350 m away to the west. There are no possible sources of vibration that could be felt beyond the installation boundary therefore no further assessment was required. The process areas are all associated plant equipment are located within the factory building therefore are not expected to generate significant noise outside of the installation boundary. The operator has stated a number of noise management techniques are employed for process noise including:

- Containment of process areas within factory building and closing of external doors and windows
- Planned preventative maintenance of plant and equipment
- Internal 'Noise at work' surveys are carried within the process building

The most possible significant source of noise is determined to be the movement of Heavy Good Vehicles (HGVs) within the installation boundary. The operator has stated a number of noise management techniques to control this noise are employed including:

- Minimisation of the reversing of vehicles and therefore the vehicle reversing alarm
- Regular maintenance of vehicles and compliance to Euro 6 standards

A noise survey to BS4142 was conducted in support of a previous planning application and submitted to supplement the noise and vibration risk assessment. The survey concluded that complaints are unlikely and the noise change is not considered significant and unlikely to be perceptible to local neighbours. In addition to this the operator has stated no noise complaints have been received from local neighbours. In conclusion, based upon the information in the application we are satisfied the appropriate measures are in place to prevent noise emissions.

Fugitive emissions

A fugitive emissions risk assessment has been completed following the H1 risk assessment methodology by the operator and assessed by us. The operator has described the process as sealed and with point source emissions via scrubber systems therefore fugitive emissions are not considered significant. The operator has stated a number of management techniques to control fugitive emissions are employed including:

- Storage of chemicals in sealed, purpose built chemical storage facilities
- Purchase of chemicals in smallest available quantities
- External doors and windows are kept closed
- Spill remediation and response procedures
- External areas are concreted hardstanding and multiple class 1 oil separators used within the surface water drainage system

- All drainage from process areas is directed through effluent treatment plant in a separate drainage system to surface water drainage
- Automatic controls to ensure no untreated effluent reaches the sewer
- Planned preventative maintenance program of all plant and equipment

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

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Specifically, the air emissions monitoring requirements have been imposed to confirm the correct functioning of the scrubber abatement systems.

We made these decisions in accordance with How to comply with your environmental permit; Additional guidance for: The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07) (September 2014).

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

We have specified reporting in the permit. We have specified annual reporting of the air emissions and quarterly reporting of the emissions to sewer. In addition we have specified annual reporting of the following parameters:

- Annual production of finished product
- Water usage
- Energy usage
- Waste produced
- Process efficiency (anodising)

We made these decisions in accordance with How to comply with your environmental permit; Additional guidance for: The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07) (September 2014).

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The relevant guidance notes for this installation are:

- How to comply with your environmental permit (October 2014)
- How to comply with your environmental permit; Additional guidance for: The Surface Treatment of Metals and Plastics by Electrolytic and Chemical Processes (EPR 2.07) (September 2014)
- Reference Document on Best Available Techniques for the Surface Treatment of Metals and Plastics (August 2007)
- Technical Guidance Note M1: Sampling requirements for stack emission monitoring
- Technical Guidance Note M2: Monitoring stack emissions: techniques and standards for periodic monitoring
- Technical Guidance Note M18: Monitoring of Discharges to Water and Sewer

A Best Available Techniques (BAT) assessment has been completed by the operator and then assessed by us, this compares the operating techniques with those contained within the relevant BAT reference document. The operating techniques used by the operator are in line with the benchmark techniques contained in the TGN and we consider them to present appropriate techniques for the facility. No further additional controls for operating techniques are required.

Monitoring of point source emissions to air will be carried out in line with the monitoring requirements outlined in TGN M2 and will have MCERTs accreditation. No further additional controls for monitoring are required.

Current sampling of point source emissions to air are not in line with the sampling requirements outlined in TGN M1 due to health and safety reasons. An improvement

condition (IC5) has been included which requires the operator to investigate the feasibility of meeting the requirements set out in TGN M1.

Monitoring of discharges to sewer will be carried out in line with the monitoring requirements outlined in TGN M18. No further additional controls for monitoring are required.

The proposed techniques/emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The operator has proposed ELVs for emissions to air that achieve better environmental performance than the indicative emission levels given in the TGN.

The permit conditions

Pre-operational conditions

There are no pre-operational conditions.

Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 1.

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.

Operator Competence

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 management system in place is accredited to IS014001. There is no requirement for additional noise and odour management plans for this installation. The decision was taken in accordance with RGN 5 on Operator Competence.

Relevant convictions

Our Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.

OPRA

The OPRA score at permit issue is 67.

ANNEX 1: Improvement Conditions

The following improvement conditions have been set:

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC1	The Operator shall provide the European Waste Catalogue (EWC) code(s) for the waste water input being introduced into the Effluent Treatment Plant. The operator shall ensure a representative sample of the waste water input is taken to allow for statistically significance testing and analysis. The EWC code(s) will be determined in accordance with guidance outlined in WM3. The EWC code(s) for the waste water input shall be provided to Natural Resources Wales in the form of a written report by the date specified.	3 months from date of permit issue
IC2(a)	The Operator shall conduct a comprehensive review of the effluent treatment process and theory and the measures taken to ensure compliance with the emission limit value for aluminium for point source emissions to sewer contained in Table S3.3 of this permit. A report detailing the findings shall be submitted to Natural Resources Wales by the date specified.	6 months from date of permit issue
IC2(b)	Upon approval by Natural Resources Wales, implement any measures found by the review in IC2(a) in order to ensure compliance with the emission limit value for aluminium in the point source emissions to sewer contained in Table S3.3 of this permit.	12 months from date of permit issue
IC3(a)	The Operator shall continue with the programme to implement the use of an MCERTS flow meter in line with the requirements set out in TGN M18. The meter shall be installed and operational and MCERTS accredited. An interim report shall be submitted to Natural Resources Wales detailing progress towards this by the due date.	3 months from date of permit issue
IC3(b)	Upon completion of IC3(a). A copy of the results of the MCERTS audit and the accreditation shall be submitted to Natural Resources Wales by the date specified.	6 months from date of permit issue
IC4	The Operator shall continue with the programme to implement the use of an on-line continuous aluminium monitor to measure the aluminium in the point source emissions to sewer contained in Table S3.3 of this permit. An interim report shall be submitted to Natural Resources Wales identifying progress towards this by the due date and then again upon completion by the date specified.	6 months from date of permit issue for interim report and 9 months from date of permit issue for final report
IC5	The operator will investigate the feasibility and cost of meeting the requirements set out in TGN M1 in order to ensure compliance with condition 3.5.4. The operator will submit a report for consultation with Natural Resources Wales by the date specified.	12 months from date of permit issue

ANNEX 2: Consultation Reponses

A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Public Health Wales	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**
Subject to the application of Best Available Techniques (BAT) to control emissions then PHW would have no public health concerns. PHW advised NRW to check the abatement technology represents BAT and is capable of operating within emission limits to protect local air quality.	A full BAT assessment has been completed by the applicant and assessed by NRW. The applicant completed an emissions monitoring survey which demonstrated the abatement technology was capable of achieving BAT-AELs.

2) Consultation Responses from Members of the Public and Community Organisations

a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Response Received from	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**

b) Representations from Community and Other Organisations

Response Received from	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**

c) Representations from Individual Members of the Public

Response Received from	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**

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