

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

ALUK (GB) Limited

**Chepstow Aluminium Treatment Plant
Newhouse Farm Industrial Estate
Chepstow
NP16 6UD**

Permit number

EPR/BB3790FX

Chepstow Aluminium Treatment Plant

Permit number EPR/BB3790FX

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The Chepstow Aluminium Treatment Plant manufactures a variety of architectural aluminium systems at its facility in the Newhouse Farm Industrial Estate, south of Chepstow. It lies within the boundary of Monmouthshire County Council. The M48 motorway runs directly to the north of the site. The surrounding areas to the north and west are predominantly rural countryside and farmland and the residential area of Mathern. The area to the east includes residential suburbs of Chepstow, Bulwark and Thornhill.

Pre-formed aluminium profiles are delivered to the site where they undergo various surface treatment operations, including chemical cleaning, sulphuric acid anodising and electrostatic powder coating. The total volume of treatment solution vats is 90 m³. Once treated the aluminium profiles are packed, stored and despatched to customers.

There are seven emission points to air, two emission points (A1 and A2) relate to the anodising process and the pre-treatment process respectively, these two stacks have scrubber abatement systems fitted. The pollutants emitted may be a mixture of sulphuric acid mist, hydrogen fluoride, particulate matter, sulphur dioxide, volatile organic compounds and nitrogen oxides. Three emission points to air are from three natural gas boilers providing heat to the process. The remaining two emission points to air are heat vents from drying and curing ovens.

There is one discharge to the foul sewer network via their on-site effluent treatment plant (ETP). All process rinse water and surface water drainage from process areas is directed through their ETP. There is a discharge consent from Dŵr Cymru in place for this single point discharge with limits placed on a number of parameters. The discharge is regularly monitored by Dŵr Cymru and the operator. Uncontaminated surface water drainage is directed into the surface water drainage system, through multiple Class I oil interceptors into two unlined balancing lagoons which drain into an existing watercourse (Rhyne), which is connected to the Severn Estuary.

The site is within 10 km of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar, River Wye SAC, Wye Valley Woodland SAC and Wye Valley and Forest of Dean Bat Sites SAC. The site is within 2 km of Severn Estuary Site of Special Scientific Interest (SSSI), River Wye (Lower Wye) SSSI and Pennsylvania Fields Sedbury SSSI in addition to Mathern conservation area and several ancient woodlands. The site is approximately 1.9 km to the south of Chepstow Air Quality Management Area.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/BB3790FX/A001	Duly made 10/03/20	Application for new bespoke permit for an aluminium treatment plant facility
Additional information received	31/03/20	Additional air dispersion modelling at revised emission limit values
Additional information received	29/04/20	Information regarding surface water drainage and effluent treatment process
Permit determined	24/06/20	Permit issued to ALUK (GB) Limited

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/BB3790FX

The Natural Resources Body for Wales (“Natural Resources Wales”) authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

ALUK (GB) Limited (“the operator”),

whose registered office is

ALUK

Newhouse Farm Industrial Estate

Mathern

Chepstow

Wales

NP16 6UD

company registration number **02881320**

to operate an installation at

Chepstow Aluminium Treatment Plant

Newhouse Farm Industrial Estate

Mathern

Chepstow

NP16 6UD

to the extent authorised by and subject to the conditions of this permit.

Signed

Date

Holly Noble	24/06/2020
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Authorised on behalf of Natural Resources Wales

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in Schedule 1 Table S1.1 (the “activities”).

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the areas shown edged in green on the site plan in Schedule 7 of this permit.

2.3 Operating techniques

- 2.3.1 (a) For the following activities referenced in Schedule 1, Table S1.1. The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in Schedule 1, Table S1.2, unless otherwise agreed in writing by Natural Resources Wales.
- (b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in Schedule 1, Table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 2.3.2 Any raw materials or fuels listed in Schedule 2 Table S2.1 shall conform to the specifications set out in that table.
- 2.3.3 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in Schedule 1 Table S1.3 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.
- 2.4.2 Except in the case of an improvement which consists only of a submission to Natural Resources Wales, the operator shall notify Natural Resources Wales within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in Schedule 3 Tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in Schedule 3 shall not be exceeded.
- 3.1.3 For the following activities referenced in Schedule 1, Table S1.1 where a substance is specified in Schedule 3 Table S3.2 or S3.3 but no limit is set for it, the concentration of such substance in emissions to water from the relevant emission point shall be no greater than the background concentration.
- 3.1.4 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
 - (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in Schedule 3 to this permit:
- (a) point source emissions specified in Tables S3.1, S3.2 and S3.3;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in Schedule 3 Tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.
- 4.2.2 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;
 - (b) the annual production / treatment data set out in Schedule 4 Table S4.2; and
 - (c) the performance parameters set out in Schedule 4 Table S4.3 using the forms specified in Table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in Schedule 4 Table S4.1;
 - (b) for the reporting periods specified in Schedule 4 Table S4.1 and using the forms specified in Schedule 4 Table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to Natural Resources Wales, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

- 4.3.1 (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
- (i) inform Natural Resources Wales,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) in the event of a breach of any permit condition the operator must immediately—
- (i) inform Natural Resources Wales, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in Schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) Natural Resources Wales shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 Natural Resources Wales shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in Schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities

Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
A1	S2.3 A(1)(a)	Pre-treatment of aluminium profiles with an alkaline treatment (degreasing and etching) followed by an alkaline rinse then an acidic rinse and drying. Anodising of aluminium profiles using a sulphuric acid electrolytic process followed by a polymer rinse and drying.	From receipt of raw materials to despatch of anodised material for further processing, despatch of process effluent to Effluent Treatment Plant and exhaust of extracted process via scrubbers to air
A2	S6.4 (B)(a)(i)	Electrostatic powder coating of either pre-treated and non-anodised or pre-treated and anodised aluminium profiles followed by curing.	From receipt of raw materials to despatch of finished product
A3	S5.4 A(1)(a)(ii)	Treatment of process effluent from pre-treatment and anodising processes.	From receipt of raw materials to discharge of treated effluent and despatch of waste material
Directly Associated Activity			
A4	Steam supply for process heating	3 x <1MWth natural gas boilers used for process heating	From receipt of fuel to despatch of hot water, steam and exhaust of the combustion products to atmosphere

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	Table 3a of Form B3 submitted as part of the application: 'How to comply' '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 Technical Guidance Note M18 (Monitoring of Discharges to Water and Sewer) Technical Guidance Note M1: Sampling of stack emissions Technical Guidance Note M2: Monitoring of stack emissions Best available techniques as described in BAT conclusions under Directive 2010/75/EU of the European Parliament and of the Council <i>Surface Treatment of Metals and Plastics</i>	23/10/19
Application	Response to sections 3a, 3b, 3c, 4, 6 of Form B3	23/10/19
Application	Document Reference: Emissions Monitoring Survey Report Reference P3924:R001 4 th June 2019	23/10/19
Responses to Not Duly Made letter dated 03/02/20	All material submitted in response to Not Duly Made letter dated 03/02/20 including all H1 risk assessments and BAT assessment ECL.076.01.01/BAT	10/03/20

Table S1.2 Operating techniques

Description	Parts	Date Received
Response to Schedule 5 Notice dated 17/03/20	Document Reference: ECL.076.01.02/ADM Issue 3 March 2020 – Air Dispersion Modelling	31/03/20
Response to Schedule 5 Notice dated 14/04/20	All material submitted in response to Schedule 5 Notice date 14/04/20	29/04/20

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 enough representative samples of the waste water input are taken to allow for statistically significant testing and analysis. The EWC code(s) will be determined in accordance with guidance outlined in Technical Guidance 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.	6 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 date specified.	6 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 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

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [point A1 on site plan in schedule 7]	Flash anodising process scrubber stack	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	70 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 14792
		Sulphur dioxide	25 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 14791
		Particulate matter	25 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 13284-1 & and MID for BS EN 13284-1
		Hydrogen fluoride	2.0 mg m ⁻³	Periodic (hourly average)	Annually	BS ISO 15713 and MID for BS ISO 15713
		Sulphuric acid mist	No limit set	-	-	-
		Volatile Organic Carbon (VOC)	No limit set	-	-	-
A2 [point A2 on site plan in schedule 7]	Pre-treatment process scrubber stack	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	70 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 14792
		Sulphur dioxide	25 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 14791
		Particulate matter	25 mg m ⁻³	Periodic (hourly average)	Annually	BS EN 13284-1 & and MID for BS EN 13284-1
		Hydrogen fluoride	2.0 mg m ⁻³	Periodic (hourly average)	Annually	BS ISO 15713 and MID for BS ISO 15713
		Sulphuric acid mist	No limit set	-	-	-
		Volatile Organic Carbon (VOC)	No limit set	-	-	-

Table S3.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A3 [point A3 on site plan in schedule 7]	<1 MWth input natural gas boiler providing heat to pre-treatment process	No parameters set	No limit set	-	-	-
A4 [point A4 on site plan in schedule 7]	<1 MWth input natural gas boiler providing heat to process	No parameters set	No limit set	-	-	-
A5 [point A5 on site plan in schedule 7]	<1 MWth input natural gas boiler providing heat to process	No parameters set	No limit set	-	-	-
A6 [point A6 on site plan in schedule 7]	Hot air exhaust from drying and curing ovens	No parameters set	No limit set	-	-	-
A7 [point A7 on site plan in schedule 7]	Hot air exhaust from drying and curing ovens	No parameters set	No limit set	-	-	-

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [point W1 on site plan in schedule 7 emission to surface water and ground from lagoon]	Uncontaminated surface water drainage via interceptors into unlined balancing lagoon	Oil and grease	None visible	Spot sample	Weekly	Visual check
		pH	Minimum 6, Maximum 9	Spot sample	Weekly	SCA Blue Book 14 ISBN 0117514284 or as agreed in writing with Natural Resources Wales

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W2 [point W2 on site plan in Schedule 7 emission to surface water and ground from lagoon]	Uncontaminated surface water drainage via interceptors into unlined balancing lagoon	Oil and grease	None visible	Spot sample	Weekly	Visual check
		pH	Minimum 6, Maximum 9	Spot sample	Weekly	SCA Blue Book 14 ISBN 0117514284 or as agreed in writing with Natural Resources Wales

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
Emission point S1 on site plan in Schedule 7 emission into foul sewer	Effluent treatment plant	Total Aluminium	2.0 mg/L	Weekly average	Monthly	As agreed in writing with Natural Resources Wales ^{Note 1}
		pH	Minimum 6, Maximum 9	Daily maximum and minimum	Continuous	SCA Blue Book 14 ISBN 0117514284 or as agreed in writing with Natural Resources Wales

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
Monitoring point M1 on site plan in Schedule 7		Flow	144 m ³ /day	Instantaneous	Continuous	As agreed in writing with Natural Resources Wales ^{Note 2}
Monitoring point: NGR: ST 52951 91163						
Emission point: NGR: ST 53030 91144						

Note 1: Current monitoring standard or method to be agreed in writing with Natural Resources Wales and again upon completion of Improvement Condition IC4

Note 2: Current monitoring standard or method to be agreed in writing with Natural Resources Wales and again upon completion of Improvement Condition IC3(a) and IC3(b)

Schedule 4 - Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1, A2	Every 12 months	1 January
Emissions to water Parameters as required by condition 3.5.1	W1, W2	Every 3 months	1 January, 1 April, 1 July, 1 October
Emissions to sewer Parameters as required by condition 3.5.1	Monitoring point: M1	Every 3 months	1 January, 1 April, 1 July, 1 October

Table S4.2: Annual production/treatment

Parameter	Units
Finished product	tonnes

Table S4.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste produced	Annually	tonnes

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air1 or other form as agreed in writing by Natural Resources Wales	24/06/20
Water	Form water1 or other form as agreed in writing by Natural Resources Wales	24/06/20
Sewer	Form sewer1 or other form as agreed in writing by Natural Resources Wales	24/06/20
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	24/06/20
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	24/06/20
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	24/06/20

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment	
To be notified Immediately	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a permit condition	
To be notified immediately	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:	
To be notified immediately	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by Natural Resources Wales under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

- For emissions to surface water, the surface water quality up-gradient of the site; or
- For emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge

“disposal” or *“D”* means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous property” has the meaning in Annex III of the Waste Framework Directive

“hazardous waste” has the meaning given in the Hazardous Waste (Wales) Regulations 2005 (as amended)

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 24 November 2010 on industrial emissions

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“notify without delay” means that a telephone call can be used, whereas all other reports and notifications must be supplied in writing, either electronically or on paper

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October

“recovery” or *“R”* means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Solvent Emissions Directive” means Directive 1999/13/EC (as amended by Directive 2004/42/EC) on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations.

“Waste code” means the six-digit code referable to a type of waste in accordance with the list of wastes established by Commission Decision 2000/532/EC as amended from time to time (the ‘List of Wastes Decision’) and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or *“WFD”* means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

“year” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit

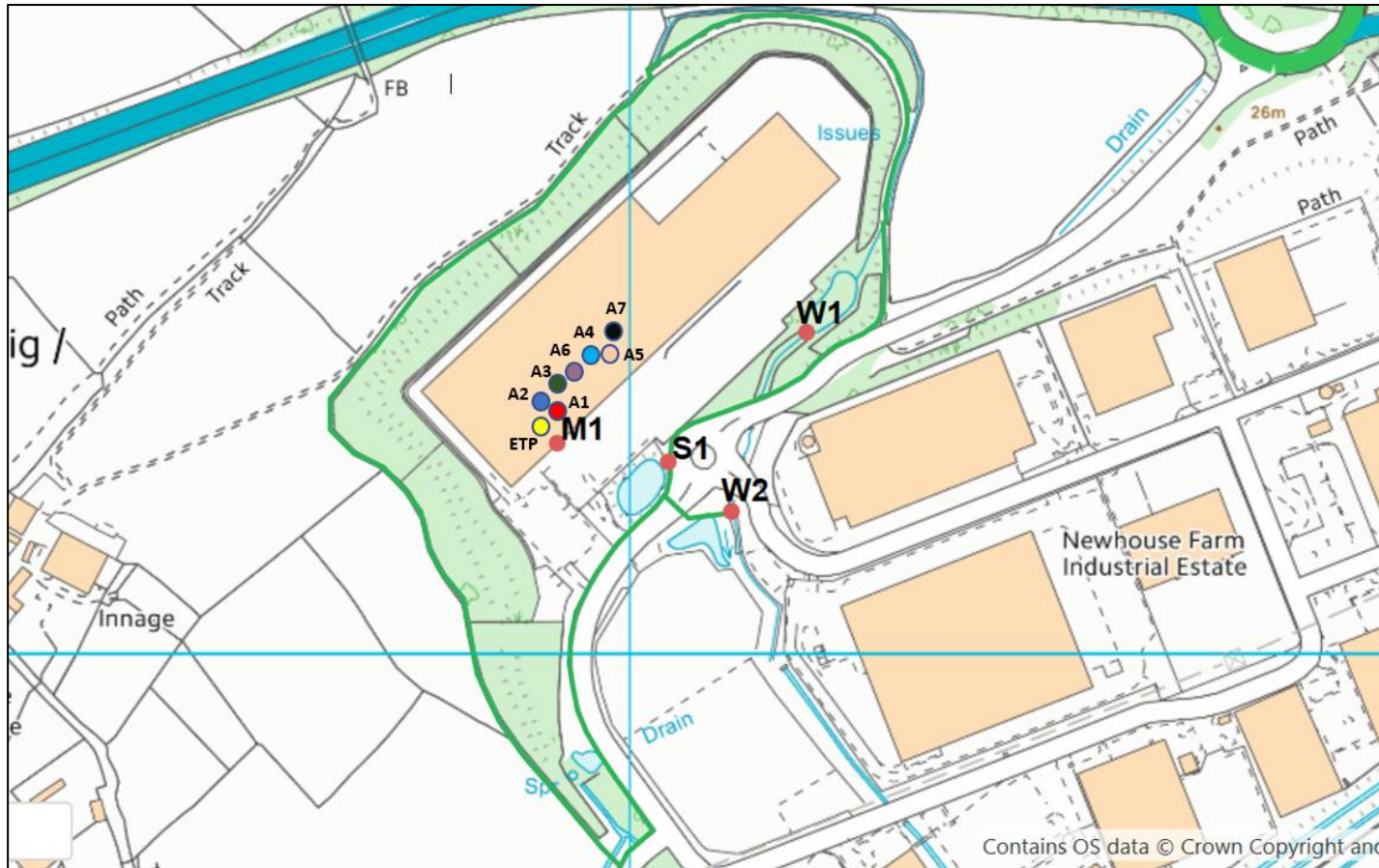
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- (a) In relation to emissions from combustion sources, the concentration in dry air at a temperature of 273 K, at a pressure of 101.3 kPa and with an oxygen content of 3 % dry for liquid and gaseous

fuels, 6 % for solid fuels and/or;

- (b) In relation to emissions from non-combustion sources, the concentration at a temperature of 273 K and at a pressure of 101.3 kPa with no correction for water vapour content

Schedule 7 - Site plan



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END OF PERMIT

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant

Form Number: Air1 / 24/06/20

Reporting of emissions to air for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission		Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
		Limit Value						
A1	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	70 mg/m ³	Periodic (average over hour)					
A1	Sulphur dioxide	25 mg/m ³	Periodic (average over hour)					
A1	Particulate matter	25 mg/m ³	Periodic (average over hour)					
A1	Hydrogen fluoride	2.0 mg/m ³	Periodic (average over hour)					
A2	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	70 mg/m ³	Periodic (average over hour)					
A2	Sulphur dioxide	25 mg/m ³	Periodic (average over hour)					
A2	Particulate matter	25 mg/m ³	Periodic (average over hour)					
A2	Hydrogen fluoride	2.0 mg/m ³	Periodic (average over hour)					

- [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.

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant Form Number: Water1 / 24/06/20

Reporting of emissions to sewer for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
		Limit Value					
W1	Oil and grease	None visible					
W1	pH	Minimum 6, Maximum 9					
W2	Oil and grease	None visible					
W2	pH	Minimum 6, Maximum 9					

[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.

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant Form Number: Sewer1 / 24/06/20

Reporting of emissions to sewer for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission		Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
		Limit Value						
S1	Aluminium	2.0 mg/L						
S1	Flow	144 m ³ /day						
S1	pH	Minimum 6, Maximum 9						

[5] 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.

[6] 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.

[7] 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.

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

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant

Form Number: WaterUsage1 / 24/06/20

Reporting of Water Usage for the year YYYY

Water Source	Usage (m ³ /year)	Specific Usage (m ³ /unit output)
TOTAL WATER USAGE		

Operator's comments:

Signed
(authorised to sign as representative of Operator)

Date.....

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant

Form Number: Energy1 / 24/06/20

Reporting of Energy Usage for the year YYYY

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh		
Natural Gas	MWh		
TOTAL			

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments:

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: EPR/BB3790FX

Operator: ALUK (GB) Limited

Facility: Chepstow Aluminium Treatment Plant

Form Number: Performance1 / 24/06/20

Reporting of other performance indicators for the period DD/MM/YYYY to DD/MM/YYYY

Parameter	Result
Finished Product (Tonnes)	
Waste Produced (Tonnes)	

Operator's comments:

Signed
(Authorised to sign as representative of Operator)

Date.....