

Compliance Assessment Report CAR_NRW0037430

Permit being assessed: BB3790FX.

For: ALUK (GB) LTD, held by ALUK (GB) Ltd

At: Aluk GB Ltd, Newhouse Farm Industrial Estate, Mathern, Chepstow, Monmouthshire, NP16 6UD.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 25/01/2021.

Parts of permit assessed: 3.1.2 Emissions; 4.2.2 Annual Performance Report 2020

NRW Lead Officer: Rebecca Green.

Report sent to: Toby Ambler, Health, Safety & Environmental Manager on 01/02/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Forms Water1, Emissions to Water and Sewer1, Emissions to Sewer, both for 1st October to 31st December, Air1, Emissions to Air, WaterUsage1, Energy1 and Performance1 for 2020 were all received on 25th January 2021. The 2020 Annual Performance Activity Review was also received on 25th January 2021.

All the reports are accepted.

Water1, Emissions to Water, 1st October to 31st December 2020

All emissions were within their respective emission limit values (ELV).

Sewer1, Emissions to Sewer, 1st October to 31st December 2020

The daily flow rate and pH were within their respective ELVs. The aluminium (Al) concentration was 3.69mg/L, the ELV is 2mg/L. Natural Resources Wales (NRW) have been formally informed of all exceedances.

Air1, Emissions to Air, 2020

All parameters were much less than their respective ELVs.

WaterUsage 1, 2020

Water usage almost doubled in 2020, compared with 2019. This was mainly due to the use of mains water to dilute the emissions to sewer so that they met consent limits/emission limit values (ELV). This practice has now been stopped and will not be used again.

Energy1

Overall energy use was less than in 2019. Energy used per tonne of production and CO₂ emissions decreased by about 10%.

Performance1

Production was slightly less than in 2019, which is a credit to AlUK's resilience, given the difficult circumstances in 2020.

Total waste generated per tonne of production was about 10% less than in 2019, but considerably more hazardous waste was generated. Non-hazardous waste generated per tonne of production was about 40% less. Waste sent to landfill was about 75% less per tonne of production and the amount of waste recycled was about 55% higher than in 2019. These are very encouraging results, showing that AlUK are committed to the sustainable use of resources.

Annual Performance Review 2020

A succinct and comprehensive review of monitoring and AIUK's environmental performance in 2020.

It should be noted that AIUK's financial year runs from 1st September to 31st August and that EMS targets are aligned with the financial, not calendar, year.

AIUK experienced significant difficulties with the performance of their effluent treatment plant (ETP) in 2020, affecting their compliance with the ELV for Al emissions to sewer. The in-line Al monitor has also proved to be less than reliable. They are in the process of commissioning improvements to the ETP and to the monitoring of Al emissions to sewer. Natural Resources Wales appreciate the considerable resources, both financial and human, that AIUK are devoting to solving these problems.

Additional measures are planned to reduce energy consumption by 30%.

The site was re-certified for ISO9001:2015 and ISO14001:2015 in 2020.

This report contains a comprehensive and clear review of the site's waste generation in 2020. AIUK will investigate recycling initiatives in 2021 and the EMS includes targets to reduce the use of packaging by 40% and to eliminate sending waste to landfill.

AIUK have only held their environmental permit since June 2020, but because of their EMS they have been able to give a full review of their performance, except for emissions to sewer, water and air, compared with 2019. The report demonstrates the company's commitment to the sustainable use of resources and the circular economy. The Welsh government is keen to encourage industry to apply both of these principles in its business decisions.

This has been a very difficult year for manufacturing industry and AIUK have shown particular resilience, especially when the considerable problems with the performance of the ETP are taken into account.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.