

Compliance Assessment Report CAR_NRW0038371

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: Site Inspection, Reason: Routine.

On 09/06/2021 between 09:45 and 14:30.

Parts of permit assessed: Emissions to sewer; plant and equipment; Improvement Conditions.

NRW Lead Officer: Rebecca Green, accompanied by Wayne Grimstead.

Report sent to: Toby Ambler, Health, Safety & Environmental Manager on 14/06/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B5 - Infrastructure - Plant and equipment	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
E4 - Emissions - Sewer	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)	

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?

Criteria	Action needed	Complete by
B5	Contact ETP supplier and set a firm date for commissioning the installed improvements.	25/06/2021

Action criteria codes are listed in the 'Important information' section below.

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

The purpose of this meeting was to discuss progress with monitoring aluminium (Al) emissions to sewer, the performance of the effluent treatment plant (ETP), progress with completing the Improvement Conditions detailed in the permit and to inspect site operations.

Agenda

1. Introductions
2. AlUK business update –
Fox plant;
effects of EU Exit/pandemic;
plans for 2021/22.
3. Aluminium emissions to sewer –
monitoring methods and alternatives;
permit requirements.
4. Effluent treatment plant –
performance and monitoring;
timescale for commissioning of improvements;
5. IC5 Compliance with TGN M1 –
AlUK's proposed course of action.
6. Inspection –
aluminium treatment plant;
effluent treatment plant;
laboratory.
AOB and meeting close.

Present at the meeting and/or site inspection:

AL, Head of Quality, AIUK GB;

TA, Health, Safety & Environmental Manager, AIUK GB;

AP, Process Development Chemist, AIUK GB;

TW, Paint Line Manager, AIUK GB;

Wayne Grimstead, Senior Officer, Industry Regulation SE, Natural Resources Wales (NRW);

Rebecca Green, (RVG), Senior Officer Industry Regulation SE (site officer), NRW.

2. AIUK Business Update

Fox plant: Further trials on the Fox plant are planned as there are some problems with coating distribution. Several solutions were discussed. The next trial will be on 12th June 2021 for one day. The coating system is slowly achieving market acceptance.

AIUK plan to automate chemical dosing of the process, which should reduce chemical consumption by up to 25% and water consumption by up to 40%.

NRW and Dwr Cymru Welsh Water (DCWW) agreed that the emission limit value for Al emissions to sewer could be increased to 3mg/L, just for 12th June 2021. Any emissions above this should be reported in the usual way.

EU Exit and Covid: Some raw materials were stockpiled before the EU exit date but there are no problems with supply at the moment. Ways of working have been adapted because of the Covid pandemic with ~ 40% of employees working from home. There have not been any serious issues on site.

Plans for 2021/2022: AIUK's financial year runs from 1st September to 31st August. Planned growth for this financial year is 8%.

3. Aluminium Emissions to Sewer

Monitoring methods and alternatives: AIUK have a spectrophotometer that is suitable for Al analysis. The operating instructions are being developed, but no estimate of when it would be operational was given. The accuracy could be verified by comparing readings from this instrument with those reported by DCWW. The spectrophotometer will be used to check the readings from the in-line Al monitor to decide whether it is necessary to submit a sample for external analysis and to send a Schedule 5 Notification to NRW.

Permit Requirements: Table S3.3 on p15 of the permit states that the reference period for monitoring discharges to sewer is a weekly average, monitored monthly. It may be more representative to install a composite sampler, analyse this on a frequency decided by AIUK and record the weekly average. This might be unnecessary if the accuracy and reliability of the in-line Al monitor can be guaranteed.

4. Effluent Treatment Plant

Performance and Monitoring: It is difficult for AIUK to assess the ETP's performance when the in-line Al monitor is not reliable. However, results from DCWW samples do seem to show lower Al concentrations than last year. AIUK have done extensive work on improving the ETP's performance and in understanding how it should be operated to optimise performance. **NRW applaud them for their efforts.**

The ion exchange resins are due to be replaced this financial year.

Timescale for Commissioning of Installed Improvements: The original due date was 24th December 2020. This has been postponed several times due to travel restrictions imposed because of the Covid situation. This extensive delay is no longer reasonable and AIUK must set a firm date with the supplier for completion of the work. See action under B5.

Action 1: AIUK to inform NRW of the commissioning date by 25th June 2021.

5. Progress with Permit Improvement Conditions (IC)

IC5: AIUK submitted a detailed report to NRW on 28th May 2021 confirming that the existing arrangements conform with the requirements of Technical Guidance Note M1 "Sampling Requirements for Stack Emission Monitoring" and also comply permit condition 3.5.4. **IC5 is complete.**

IC1: Determination of the European Waste Code for the inputs to the ETP. This was originally due by 24th December 2020; the due date was extended to 24th June 2021.

Action 2: *AIUK must ensure that the consultants they have employed will meet the due date.*

IC3(a) and (b): The installation of the MCERTS flowmeter and subsequent MCERTS audit are dependant upon the suppliers who are commissioning the ETP improvements. This has been significantly delayed due to the supplier's unwillingness to travel to the UK because of the Covid situation and the due date has already been extended several times. This delay cannot be tolerated much longer.

Action 1: *AIUK to inform NRW of the commissioning date by 25th June 2021.*

6. Site Inspection

RVG and WG would like to thank TW for his informative and comprehensive explanation of the production and associated processes.

The site was clean and tidy and all containment measures were sufficient and in good condition. The laboratory was equipped with a range of instruments and equipment for wet chemical analysis.

The sump for the scrubber contained some water which RVG was assured was emptied weekly.

The supernatant liquid in the settlement tank for the ETP was coloured and unusually turbid. There was also some material floating on the surface. AIUK may want to review the treatment process.

The sampling location for the in-line Al monitor is a long way from the instrument. This may account for the inaccuracies in its readings. It will be moved when the flowmeter is installed.

7. AOB

Charges for this financial year (1st April 2021 to 31st March 2022) were discussed. NRW are preparing invoices to send to operators. Charges are calculated by multiplying the site's OPRA score by the compliance band factor and then by the charge multiplier. In AIUK's case, for Band B compliance, this will be $69 \times 100\% = 69$ then $69 \times 102 = £7038$ (£6686 for a Band A site).

As AIUK are new permit holders NRW will carry out an Operator Monitoring Assessment (OMA) this year, probably in the second quarter (July to September).

AIUK discussed several proposals they have for reducing raw material consumption. These include installing solar panels on the roof, collecting rainwater from the roof and manufacturing cleats on-site from their own scrap Al. The last proposal may require a permit variation as this would be a new process, depending upon its scale. AIUK should discuss this with NRW once they have firmer proposals.

The site is well run with a team that are committed to operating with minimal environmental impact. The management system is comprehensive and employees seem to understand their responsibilities and use the management system to fulfil them.

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.