

Compliance Assessment Report CAR_NRW0038972

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 23/11/2021 between 10:30 and 14:45.

Parts of permit assessed: Site Inspection - Effluent treatment plant & monitoring

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

Report sent to: Anna Plesniar, Process Development Scientist on 01/12/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
C1 - General Management - Staff competency/training	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
E4 - Emissions - Sewer	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
A1	Review IC completion.	28/02/2022

Criteria	Action needed	Complete by
C2	See Action 2 below.	31/12/2021
G1	See Action 5 below.	31/12/2021
C1	See Action 3 below.	31/01/2022
G1	See Action 4 below.	28/02/2022

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, to inspect the improvements to the effluent treatment plant (ETP), to evaluate progress with completing the Improvement Conditions detailed in the permit and to inspect site operations.

AIUK provided Natural Resources Wales (NRW) with a brief agenda as a guide for the meeting.

1. Introduction
2. AIUK Business Update
 - Fox plant
 - ETP improvement project
3. Inspection
 - ETP
 - laboratory.

Present at the meeting and/or site inspection:

LG, Production Manager, AIUK;

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

ADF, Maintenance Manager, AIUK;

AP, Process Development Chemist, AIUK GB;

TW, Paint Line Manager, AIUK GB;

Wayne Grimstead, (WG) Senior Officer, Industry Regulation SE, NRW;

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

1. Introduction

RVG and WG introduced themselves to SM who has only recently joined the company. SM briefly introduced himself.

2. Business Update

Fox plant

AIUK will begin production using the Fox plant w/c 17th January 2022 and will be going through an external quality audit on 19th January 2022, conducted by Qualicoat.

ETP Improvement Project

The improvements installed earlier this year have been commissioned and connected to the ETP control systems. They are now fully operational.

The in-line aluminium (Al) monitor is now on a feedback loop to the ETP. Readings above the emission limit value (ELV) will result in the discharge from the sand filters being automatically re-directed to a storage tank so that it can be treated again in the ETP to reduce the Al concentration to at or below the ELV. This should prevent discharges to sewer exceeding the ELV. However, the Al monitor only measures dissolved Al (the ELV refers to total Al) and can give variable results. NRW are therefore concerned that either effluent above the ELV could be discharged to sewer or that it will be needlessly re-treated, wasting time and resources. AIUK, in partnership with the Al monitor's manufacturer, are trying to quantify the variability by taking samples when the Al monitor is sampling and sending them for laboratory analysis. This will carry on for a week.

Action 1: Send the analysis results to NRW once they have all been received and collated.

Action 2: Send NRW a copy of the updated procedure for preventing the discharge of non-compliant effluent to sewer. Due date: 31st December 2021.

Action 3: Send NRW confirmation that all relevant personnel have been trained in the use of, and procedures for, ensuring that non-compliant discharges are not discharged to sewer. (Action outstanding from CAR_NRW0037199). Due date: 31st January 2022.

Action 4: Send NRW an up to date copy of the internal method for verification and checking of readings from the Al monitor. Due date 28th February 2022.

3. Inspection**ETP**

The inspection concentrated on the sand filters, discharge point, flow meter and Al monitor.

There are two sand filters each having 1345L capacity, housed in sealed units, cleaned by a backwashing system; the washings are sent to the ETP for treatment. The system is designed so that there is one unit in use and the other is in standby, ready to use. Hydraulic valves control where the effluent goes and also its diversion back to the ETP if the Al concentration is at or above the ELV.

The flow meter is MCERTS approved. AIUK are due to be audited on 8th December 2021.

Action 5: Send the audit findings report to NRW as soon as AIUK have received it. This will complete the requirements of Improvement Condition (IC) 3. Due date: 31st December 2021.

The Al monitor has been re-sited to a more suitable position and the sampling line is shorter and straighter. The discharge from the sand filters flows through a pressurised pipe to minimise air in the pipe. This should prevent the Al monitor from taking air in when it samples, which was thought to have caused some of the previous inaccurate readings.

The output from the meter is on a feedback loop controlling whether the effluent is discharged to sewer or re-circulated for further treatment in the ETP.

Laboratory

AIUK have an on-site laboratory used for process control and product evaluation, mainly employing wet chemistry and some instrumental analyses. They have a basic spectrophotometer which can be used to analyse Al concentrations in the effluent. Preparation for this test is time-consuming and complicated and so AIUK have approval for cap-ex to purchase a more advanced instrument. Before placing the order AIUK might like to evaluate alternative instruments which may prove more versatile and thus more cost effective. For instance atomic absorption spectrophotometry would give them a wider range of determinands and could be useful for the process control of the surface treatment solutions. Some x-ray fluorescence machines can be used to analyse solutions as well as for coating evaluation.

The areas inspected during this visit were clean and tidy and in good condition. Personnel working in these areas should be commended for their efforts.

AOB**Outstanding Actions from CARs**

There are numerous actions outstanding from previous CARs, many relating to the installation and commissioning of the ETP improvements and the re-siting of the AI monitor. These delays were beyond AIUK's control and were due, in part, to the pandemic.

Improvements to the ETP: Actions from all previous CAR forms concerning the installation and commissioning of improvements to the ETP are too numerous to list. Action C1 in CAR_NRW0037199 remains open and is referred to in Action 3 above.

This is to confirm that all other actions are complete and can be closed.

AI monitor and MCERTS flow meter: All actions concerning the relocation of the in-line AI monitor and the installation of an MCERTS flow meter are complete and can be closed.

Progress with Improvement Conditions (IC) in the Permit

Delays in completing the ICs were mainly due to the pandemic.

IC2b: This concerns the implementation of measures to ensure discharges to sewer comply with the ELV for AI. AIUK have implemented the necessary measures and this IC can be closed once these measures are proved to be effective. To be reviewed by 28th February 2022.

IC3a and IC3b: This concerns the installation and auditing of an MCERTS flow meter. This can be closed when Action 5 above is completed.

IC4: This concerns the use of an in-line AI monitor. The monitor is in use and has been re-sited to improve its sampling train. It continues to provide variable readings. Until the reliability of the meter improves it would not be appropriate to close this IC, especially since the output controls where the treated effluent goes. To be reviewed by 28th February 2022.

Discharges to Sewer

Non-compliant discharges: Scoring for discharges to sewer that exceed the ELV for AI has been suspended for some time. This cannot continue. The suspension of scores will be reviewed on or before 28th February 2022.

Sampling of discharges to sewer: AIUK might like to consider the installation of a composite sampler. This would enable them to obtain a more representative sample of discharges to sewer over a given time period. It may also be more efficient than taking spot samples from the discharge flow.

External laboratory analysis

Whilst the laboratory AIUK use is not ISO17025 accredited for testing trade effluent, the scope of its Schedule and the test methods seen by NRW show that it is competent to carry out the analysis for AIUK. This laboratory has an exceptionally fast turnaround time, which is of great benefit to AIUK.

The pandemic has proved to be a significant challenge, both to the business and to the installation and commissioning of AIUK's planned improvements to the ETP. All the teams involved, particularly EHS, production and maintenance, should be commended for their determination and thoroughness in ensuring that the improvements were finally commissioned. NRW also recognise that this has been an important financial investment for AIUK.

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.