

## **Review of the fugitive emissions from the Bedwas Site - 2017**

### **Possible Fugitive emissions to air and land**

The most likely sources of fugitive emissions on the Bedwas site are:

1. Loading and unloading of waste containers/skips/tanks and tankers.
2. Excessive extraction velocity over process tanks
3. Accidental loss of containment from failed plant and equipment
4. Release of steam from anodising boiler after a fault.

### **Control of fugitive emissions to air**

The following techniques are used to minimise fugitive emissions:

1. Plastic waste skip is covered and all others are uncovered. Hazardous waste is bagged before placing in 205 litre drums. There is also good housekeeping around all yard and storage areas.
2. The extraction system above the sulphuric acid tanks in the anodising process has been checked and is found to be satisfactory. The fumes from this area are not volatile and not expected to be an issue other than corrosion on roof areas in close proximity.
3. There are emergency procedures in place but fugitive emissions would be difficult to quantify in these circumstances. There is secondary containment in place. Bulk storage tanks are not in use. All oil bulk storage and waste oil storage tanks have been removed from site.
4. There are no visible plumes from the Bedwas site.

### **Possible Fugitive emissions to Water**

#### For subsurface structures

1. Emissions from subsurface pipe work and tanks

#### For surfacing

1. Failure of containment from storage areas

#### All above ground tanks

1. Failure of containment from storage areas
2. Spillage during delivery

#### Storage areas for IBC's, drums, bags etc

1. Failure of containment from storage areas
2. Spillage during delivery

### **Control of fugitive emissions to water**

1. A site plan is available that shows underground pipes. These pipes will be checked on an annual basis (including visual check). Any unusual observations or chemical usages are reported if they occur. Many of these pipes are in ducting under floor level.
2. All storage areas are marked on a site plan. Most storage areas are bunded (bunds were relined in 2006) and have spill kits and/or drain protectors in close proximity and are checked on a regular basis. Some internal storage areas located away from surface drainage systems. Surface water drains on site are connected to one of two interceptors.
3. All storage areas are checked on a weekly basis including contents of bund. Any bunds found containing a reasonable quantity of rainwater are emptied. The inlet pipe for bulk storage tanks is within the bund area. All bunds are lined.
4. All storage areas are bunded and situated away from surface drains where possible. Where this is not possible, a drain cover is provided in close proximity. Containers are stored with lids on whether they are full or empty. Integrity of containers is checked on delivery.
5. Floor area underneath the tanks in anodising has been relined with fibreglass. This was carried out over a period of 2 years and completed in 2007. Borehole monitoring continues to be carried out 6 monthly.

### **Odour**

There are no obvious odour-related annoyance areas on Bedwas site. Occasionally there can be a very slight odour from the effluent plant but this is not present at all times and impossible to quantify. The effluent plant only operates on days (8am to 4pm) and there are no complaints from nearby residents even though housing is only a short distance away from the building. The doors to this building are normally closed.

There are no significant fugitive emissions from any other sources.