

Date December 15th 2016

Victoria Seller
Regulated Industry Permitting Team
Natural Resources Wales
Maes Newydd
LLandarcy
Neath Port Talbot
SA10 6JQ

Cc: Ms R. Green

Dear Ms V. Seller

EnerSys Newport Permit Review Regulation 60 Response

1. *Confirm whether or not you currently comply with the requirements of the BAT conclusion, including associated emission levels, providing a description of the techniques in place and how they meet the standard.*

Attached to the email is document 03 BAT Conclusions EnerSys December 2016. This is our compliance response with regard to the BAT reference document for the Non Ferrous Metals Industries.

2. *If you do not comply with the BAT conclusion carry out a BAT Assessment.*

After NRW have reviewed the EnerSys BAT Conclusions document if there is an agreed need to complete any BAT Assessments for specific conclusions these will be undertaken.

3. *Where there is a BAT Associated Emission Level (BAT AEL) specified in the BAT Conclusion, with which you will not comply, you must provide sufficient technical and commercial information to demonstrate that achieving that BAT AEL would lead to costs that are disproportionately high, compared with environmental benefits.*

Review of emission levels against the revised BAT AELs for the Non Ferrous Metals Industries has commenced. Results to date are included in the 03 BAT Conclusions EnerSys December 2016 document attached. Further testing is commissioned starting in January 2017 so that data can be established for each emission point against the BAT AELs.

4. *Where compliance with the BAT conclusions leads to the substantial refurbishment or installation of new combustion plant with an aggregate thermal input of greater than 20MWth which generates more than 100kWth of waste heat you must provide sufficient technical and commercial evidence to demonstrate compliance with Article 14, paragraph 5 of the directive 2012/27/EU on Energy Efficiency. This must include an assessment of the technical feasibility and costs and benefits associated with installing a combined heat and power system or providing district heating and where this assessment shows that the costs are not disproportionate to the benefits, proposals to incorporate these measures into your plant.*

EnerSys does not have combustion plant of this scale and therefore this paragraph is not relevant.

5. *For all discharges to surface waters from the site you must provide emissions data for the following hazardous pollutants: cadmium, mercury, nickel, lead, benzene, polyaromatic hydrocarbons and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in the M18 guidance on 'Monitoring of discharges to water and sewer.'*

Initial testing on these substances has been completed and the results are included within the 03 BAT Conclusions EnerSys December 2016 document. Further testing will be completed commencing January 2017 and the results will be submitted to NRW.

6. *With reference to the risk assessment guidance on the gov.uk website entitles surface water pollution risk assessment for your environmental permit carry out the following assessments: Screening tests for mercury, cadmium, nickel, lead, benzene, polyaromatic hydrocarbons and any other relevant priority hazardous substances. For any substance not screened out you will need to carry out modelling as described in the risk assessment guidance 'Surface water pollution risk assessment for your environmental permit.'*

Initial surface water testing on mercury, cadmium, nickel, lead, benzene and polyaromatic hydrocarbons as stated in section 5 above has been completed. The results are included in the 03 BAT Conclusions EnerSys December 2016 document attached to the email.

In line with Table 2 of BAT 17 and after discussion with NRW testing for arsenic, cobalt, copper and zinc in surface water leaving the installation will also be completed in 2017 to establish data on these parameters. The levels of these metals within incoming raw materials are extremely low as we purchase 99.99% pure lead. Data on these levels is included within the 03 BAT Conclusions EnerSys December 2016 document.

7. *Where your activity involves, the use, production or release of relevant hazardous substance as defined in the Industrial Emissions Directive carry out a risk assessment considering the possibility of soil and groundwater contamination at the installation. Where any risk of contamination is established prepare and submit a baseline report containing information necessary to determine the current state of soil and groundwater contamination. Or provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of soil and groundwater contamination.*

EnerSys submitted its latest annual groundwater assessment in June 2016. In 2017 the annual groundwater assessment will be completed together with soil sampling, as the previous round of soil sampling was submitted in 2007 as part of establishing the baseline site condition report for the installation. The 2017 data will therefore be building on information already submitted and will meet the requirements of the Industrial Emissions Directive Article 22(2) guidance document on the contents of site condition reports.

We look forward to our discussions with you on the above.

Yours sincerely



Paula Terrett
Safety, Health, Environment and Quality Advisor, EnerSys Newport.