

Compliance Assessment Report CAR_NRW0039309

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 28/01/2022.

Parts of permit assessed: 4.2.2 Annual Reports 2021; 4.2.3 Emissions to Air 2021

NRW Lead Officer: Rebecca Green.

Report sent to: Shane McDonald, HS&E Manager on 10/02/2022.

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)	

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 Air1, Emissions to Air, WaterUsage1, Energy1 and Performance1 for 2021 were all received on 31st January 2022. The 2021 Annual Performance Activity Review was received on 28th January 2022, an amended version was received on 1st February 2022.

All the reports are accepted.

Air1, Emissions to Air, 2021

All parameters were much less than their respective emission limit values (ELV) for the second year running.

WaterUsage1, 2021

Total water usage and use per tonne of production (ptp) both halved in 2021, compared with 2020. This was because mains water is no longer used to dilute the emissions to sewer so that they meet Consent Limits/ELV. This practice was stopped in October 2020 and must not be used again.

Energy1, 2021

Electricity and gas use and associated CO₂ generation were all higher than in 2020. Gas use increased by about 4% ptp probably due to the increased use of the anodising plant. Electricity use decreased by about 8% ptp. CO₂ emissions decreased slightly ptp.

Performance1, 2021

Production was almost 15% higher than in 2020.

Total waste generated was higher than in 2020 and similar ptp to that produced in 2020. The total amount of hazardous waste was less than in 2020 and more than 30% less ptp. More non-hazardous waste was generated, rising by about 10% ptp. Waste sent to landfill was about four times more ptp than in 2020. More waste was recycled in 2021, but the amount ptp was about 10% less.

The reduction in hazardous waste is encouraging, but AIUK should investigate the reasons for the large increase in the amount sent to landfill and the reduction in recycled waste.

Annual Performance Review 2021

A comprehensive review of monitoring and AIUK's environmental performance in 2021. AIUK's financial year runs from 1st September to 31st August and EMS targets are aligned with the financial, not calendar, year.

All emissions to water in 2021 were less than their ELVs.

There were several breaches of the ELV for aluminium (Al) emissions to sewer in 2021, some were probably due to inaccurate readings from the in-line Al monitor. AIUK now operate a procedure to send samples for laboratory analysis when the Al monitor detects a breach of the ELV. An MCERTS flowmeter has been installed and accredited.

The effluent treatment plant improvements installed at the beginning of 2021 were commissioned in

September 2021 and are operating. These will prevent discharges above the A1 ELV (as detected by the A1 monitor) from being discharged to sewer. However, results from the monitor are not always accurate. A1UK are continuing their search for a solution to this problem.

Water consumption is discussed above.

Gas consumption rose in 2021, but CO₂ from electricity generation fell slightly. Lighting in areas not being used is now being turned off which may reduce consumption.

Waste generation is discussed above.

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

A1UK plan to concentrate on three main environmental objectives this year. They have started work on a Carbon Reduction Plan, an internal team will review wrapping of stock items and routes for recycling or re-use of waste powder paint will be investigated.

It is disappointing to see that A1UK did not achieve the 30% reduction in electricity use or the reduction in the amount of waste sent to landfill that were set as targets for 2021. However, it has been another difficult year for manufacturing industry so perhaps these targets could be met in 2022. A1UK continue to work closely and openly with NRW to improve their operations and minimise their impact on the environment. This is a valuable relationship and NRW are confident that it will continue in 2022.

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.