

Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for Amtek Aluminium Castings (Witham) Limited operated by Amtek Aluminium Castings (Witham) Limited.

The permit number is EPR/JP3335WG.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Description of the main features of the Installation

The main features of the permit are as follows.

The installation will be operated under Scheduled Activity:

Section 2.2 Part A(1)(b):

'Melting including making alloys, of non-ferrous metals, including recovered products and the operation of non-ferrous metal foundries where:

- (i) the plant has a melting capacity of more than 4 tonnes per day for lead or cadmium or 20 tonnes per day for all other metals; and
- (ii) any furnace bath or other holding vessel used in the plant for the melting has a design holding capacity of 5 tonnes or more.'

The installation will be operating under a four phase plan:

Phase One: 1 furnace (6 tonne holding capacity) and 3 die cast machines.

Phase Two: 1 furnace and 7 die cast machines.

Phase Three (installed 4th Quarter 2017): 2 furnaces and 10 die cast machines.

Phase Four: The Final Stage: 3 furnaces and 24 die cast machines.

This application covers up to Phase Three.

The site at Kidderminster will focus on the melting and casting of aluminium to produce components for a required market; automotive parts. Raw material in the form of ingots or scrap will be bought to the site and melted before being cast into a desired component for export to the company's plant at Coventry for machining, quality check and export to customers.

For the first 6 months of operation Amtek will only be melting Aluminium Ingots. Following this, the site will accept and process clean scrap Aluminium of a specific grades: ALAR/BSMA Scrap Classifications.

The Melting Process is a continuous activity of melting ingots, or recycled aluminium from operations in a natural gas furnace (Striko Melter MH II-T 6000/4000 G Plus+ hydraulically tiltable shaft furnace). Silicon, copper and iron are added to achieve an alloy composite. When the alloy reaches a molten state, it is ready for processing and the alloy is transferred to a holding furnace located at the die casting machine.

During the Die Cast & Trim Process, alloy from the holding furnace is dosed into a shot sleeve and injected with high pressure into a die. The alloy solidifies into a cast product. The cast product is robotically removed from the die and placed in a trim fixture to remove excess material.

The trimmed cast products are then shot blasted to provide a uniform surface finish and remove any burrs.

Each furnace has a melt capacity of 4 tonnes per hour, and will be in production of metal for 80 hrs per week, 47 weeks per annum; giving a yearly total of $80 \times 4 \times 47 = 15,040$ tonnes per furnace /per annum.

The installation also comprises the following directly associated activities:

- Hydrated magnesium silicate lined filter bag, lime injection and internal burner system for the treatment of off-gas to be emitted via the stack
- An Effluent Treatment Plant (ETP) for process water - The process water (run-off from the scrap bays and die wash area) will be treated by the ETP and be re-circulated as process water. A small percentage of process water from the ETP is discharged to sewer under consent, following treatment.
- Softening treatment and Reverse Osmosis system for cooling water - The cooling water is re-circulated through cooling towers and is subject to softening treatment and a Reverse Osmosis system prior to use.
- An interceptor and attenuation tank for surface water run-off

Point source emissions:

- Emissions to air from a stack comprising combustion, melting and holding emissions
- Emissions to sewer of a small percentage of treated process water
- Emissions of surface water runoff to river - Site surface water is collected and discharged via a system of oil interceptors and attenuation tanks to the River Stour
- Waste skimmings/dross and salt slag emissions – the waste dross is cooled under extraction to a bag filter in order to capture any fumes, this waste dross and salt slag is collected from site for extraction and reuse by a contractor
- Waste flue dust

The site is based at an industrial site on the A451 between Kidderminster and Stourport at coordinates; 382140,273650.

There are 11 local sensitive receptors, 3 SSSI sites, 4 Local Wildlife Sites (LWS) and 2 Local Nature Reserves (LNR) within 2km of the installation.

The ISO 14001:2008 standard has been used as the basis for the implemented EMS, and although certification to this standard is yet to be achieved, such certification is expected and will be sought.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Pre-operation conditions

We have imposed a pre-operational condition in the permit. This is due to:

- the acceptance and treatment of scrap metal on site. The acceptance and storage of the scrap metal means the site must have a Fire Prevention Plan (FPP) in place, as the site will be melting Aluminium ingots for the first 6 months, this FPP is not required for this period. A FPP will, however, need to be submitted and approved by the Environment Agency prior to the acceptance of any scrap metal.
- The concerns regarding emissions of NO_x once a second furnace is installed and the potential environmental risk to the local sensitive receptors as discussed below. Prior to the operation of a second furnace at the installation, a revised 'Air Quality Assessment' report must be submitted and approved by the Environment Agency in line with the second pre-operational condition.

Environmental Risk

The H1 tool and detailed modelling for emissions to air have been submitted as part of the application (140932 Air Quality Assessment – Amtek. Kidderminster – Revision 5), which included an assessment of the impacts of odour. The emissions to air report was audited by the Environment Agency and we agree with the conclusions of the applicant.

Before the assessment could be used for permit determination, clarification for the following was required:

- Whether an assessment for Chromium (Cr) is required for aluminium foundry installations. – *Consultation of the relevant BRef Document (Reference Document on Best Available Techniques in the Non Ferrous Metal Industries) has confirmed this was included in error and is not an emission which needs to be considered from secondary aluminium foundry installations*
- Whether the emission concentrations used in their assessment are achievable as follows :
 - 20mg/m³ for SO₂
 - 10mg/m³ for NO_x

The applicant has confirmed (via email) that these limits are achievable, with one furnace installed, and we have set these limits in the permit.

The applicant has however expressed concerns that the NO_x ELV may not be able to be complied with once the second

furnace has been installed, we have therefore included into the permit a pre-operational condition for this second furnace.

Natural England have been consulted on the assessment of impacts to the local SSSI's and are in agreement that operations from the installation are not likely to cause damage to the features of the SSSI.

All other emissions from operations at the installation can be classed as insignificant or appropriate measures are in place to minimise in accordance with the Environment Agency's Guidance:

- H1, Annex F- Emissions to air
- H1, Annex D1- Surface Water Discharges: assessment of hazardous pollutants
- 66_12 Simple aerial impact assessment
- H3 – Noise assessment and control
- H4 – Odour management

Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> • Local Authority Environmental Protection Department • Foods Standards Agency (FSA) • Health and Safety Executive (HSE) • Public Health England (PHE) • Local Fire Service • Local Sewerage Undertaker (Severn Trent) • Ground Water & Contaminated Land (GW&CL) 	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
Operator		
Control of the facility	<p>We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.</p>	✓
European Directives		
Applicable directives	<p>All applicable European directives have been considered in the determination of the application.</p>	✓
The site		
Extent of the site of the facility	<p>The operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility including discharge points.</p> <p>Plans are included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Site condition	<p>The operator has provided a description of the condition</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
report	<p>of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p> <p>The applicant has collected baseline data, but the landowners may have to remediate areas of land within the installation boundary as part of the planning permission requirements. Consequently we have set improvement condition IC2 to provide an updated site condition report once this remediation is complete</p>	
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <p>A full assessment of the application and its potential to affect the nearby, Sites of Special Scientific Interest, Local Wildlife Sites and Local Nature Reserves has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites.</p> <p>The applicant originally assessed the impacts at ecological receptors using emissions to air benchmark levels (including SO₂, NO_x and acid gases) detailed in Sector Guidance EPR 2.03: Non-Ferrous Metals and the Production of Carbon and Graphite. Using these benchmarks, there is a likely significant contribution to an exceedance of the nutrient nitrogen and acid deposition at two local SSSIs. The applicant’s revised assessment (140932 Air quality assessment – Amtek, Kidderminster – Revision 5) used 20mg/m³ for SO₂ and 10mg/m³ for NO_x and is based on a conservative assumed abatement efficiency from the benchmark levels, and actual releases from similar aluminium foundries. Using these values reduces the risk with only Wilden Marsh and Meadows SSSI PC for acid deposition being greater than the 1% screening criteria. In reality the abatement is likely to reduce the emissions of SO₂ to be in the realms of 1-3mg/m³ (data taken from a similar plant in Sweden:Swerea SWECAST AB, Measurement of emissions from aluminium foundry, Report 2013-005).</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>In addition, taken from APIS:</p> <ul style="list-style-type: none"> ○ Uncertainties in the critical loads of acidity are also apparent as a consequence of a number of assumptions including the fact that no account is taken of soil variability within a 1km square, and acidity classes are assigned based on the dominant soil type present. <p>Including all of the above it is therefore concluded that acid deposition from the installation at Wilden Marsh & Meadow (SSSI) not likely to damage the features of the site.</p> <p>Emission limits have been placed in the permit, based on the modelled emission limits to ensure that this is the case.</p> <p>The following Emission Limit Values have been incorporated into the permit: NO_x: 10 mg/m³ SO₂: 20 mg/m³</p> <p>Formal consultation has been carried out with Natural England. The consultation responses (Annex 2) were taken into account in the permitting decision.</p>	
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>Including information supplied via Schedule 5 Notices we can deem that the operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment:</p> <ul style="list-style-type: none"> ○ All point source emissions to air may be categorised as environmentally insignificant with the exception of NO_x and SO₂ emissions which are discussed in the "Biodiversity" aspect above. ○ All point source emissions to sewer may be classed as environmentally insignificant 	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<ul style="list-style-type: none"> ○ Fugitive emissions of noise can be categorised as ‘not adversely affecting local receptors’. A full noise assessment in line with the Environment Agency’s Guidance: H3 Part 2 Noise Assessment and Control, was submitted with the application. We can conclude that appropriate measure for control are in place. ○ Fugitive emissions of odour have been assessed in line with the Environment Agency’s guidance H4 Odour Management – How to comply with your permit. The highest combined odour concentration outside of the installation boundary has been predicted to be 23% of the odour benchmark (for moderately offensive odours) of $30u_e/m^3$ and thus is unlikely to cause offense. We can conclude that appropriate measure for control are in place. ○ Fugitive emissions to ground and surface water have been assessed in line with the Environment Agency’s Guidance H1 Annex A – Amenity & accident risk from installations and waste activities. The site benefits from a new drainage system which includes an interceptor and attenuation tank. All oil containment and chemical storage is above ground in bunded (110% of contents of largest tank) storage tanks. We can conclude that appropriate measure for control are in place. <p>Please see Key Issues Section.</p>	
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>Emissions to air of</p> <ul style="list-style-type: none"> ○ Particulates ○ VOCs ○ HF ○ CO ○ Dioxins and Furans ○ HCl <p>have been screened out as insignificant, and so the Environment Agency agrees that the Applicant’s proposed techniques are BAT for the installation.</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>Emissions to sewer via an Effluent Treatment Plant of</p> <ul style="list-style-type: none"> ○ Chlorides ○ Sodium Carbonate ○ Sodium Chloride ○ Iron ○ Aluminium ○ Copper ○ Tin ○ Zinc ○ Calcium ○ Magnesium ○ COD ○ Suspended Solids <p>have been screened out as insignificant by our H1 assessment tool, following the incorporation of the correct Q95 river flow for the River Stour (the revised H1 assessment tool can be found on EDRM), and so the Environment Agency agrees that the Applicant's proposed techniques are BAT for the installation.</p> <p>Emissions of NO_x and SO₂ to air cannot be screened out as insignificant. The Environment Agency has therefore assessed whether the proposed techniques are BAT.</p> <p>The use of low NO_x burners and lime injection to abate SO₂ have been proposed as techniques to control these emissions to air. This is in line with the Environment Agency's Sector Guidance Note EPR 2.03: Non-Ferrous Metals and the Production of Carbon and Graphite.</p> <p>Conditions are being imposed for which the appropriate emission limits are more stringent than those associated with the best available techniques as described in BAT conclusions. (see also emission limits aspect below)</p> <p>More stringent than BAT ELVs for NO_x and SO₂ have been set as discussed in the "Biodiversity" aspect above.</p> <p>Fire Prevention Plan, For details see key issues section of this document.</p>	

Aspect considered	Justification / Detail	Criteria met												
		Yes												
	We consider that the emission limits included in the installation permit reflect the BAT for the sector.													
The permit conditions														
Raw materials	We have specified limits and controls on the use of raw materials and fuels. We have specified: <0.1% sulphur content in the Gas Oil (Diesel) used on site	✓												
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>This installation has very strict specifications for the waste that can be incorporated into the operations in order to meet specifications in their final products. As a consequence only the following waste code for scrap metal will be accepted on site:</p> <table border="1"> <thead> <tr> <th colspan="2">Table S2.2 Permitted waste types and quantities for melting to produce automotive castings</th> </tr> <tr> <th>Maximum quantity</th> <td>Maximum treatment capacity of 40 tonnes per day. Maximum of 280 tonnes stored on site at any one time.</td> </tr> <tr> <th>Waste code</th> <th>Description</th> </tr> <tr> <td>16</td> <td>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</td> </tr> <tr> <td>16 01</td> <td>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</td> </tr> <tr> <td>16 01 18</td> <td>non-ferrous metal</td> </tr> </thead> </table>	Table S2.2 Permitted waste types and quantities for melting to produce automotive castings		Maximum quantity	Maximum treatment capacity of 40 tonnes per day. Maximum of 280 tonnes stored on site at any one time.	Waste code	Description	16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)	16 01 18	non-ferrous metal	✓
Table S2.2 Permitted waste types and quantities for melting to produce automotive castings														
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16 01 18	non-ferrous metal													
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. Please see Key Issues Section	✓												
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions.	✓												

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> ➤ appropriate management systems and management structures are in place and that sufficient financial, technical and manpower resources are available to the operator to ensure compliance with all the permit conditions. ➤ the appropriate measures are in place for the closure and decommissioning of the facility. 	
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>The following substances have been identified as being emitted, to air, in significant quantities and ELVs and technical measures based on BAT have been set for those substances.</p> <ul style="list-style-type: none"> ○ Particulates ○ VOCs ○ HF ○ CO ○ Dioxins and Furans ○ HCl <p>As discussed in the Biodiversity aspect above emission limits for</p> <ul style="list-style-type: none"> ○ NO_x ○ SO₂ <p>Have been set at modelled emission limits to ensure the protection of the nearby SSSI's.</p> <p>Substances have been identified as being emitted to</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>sewer, we have decided that emission limits should not be set in the permit. This is due to a completed H1 risk assessment tool of the emissions to sewer showing all emissions can be classed as environmentally insignificant.</p> <p>In addition, the emissions to sewer from the installation will be further treated at the Kidderminster (Oldington) Waste Water Treatment Works.</p>	
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to protect the surrounding environment from emissions to air and ensure compliance with the Emission Limit Values set in the permit.</p> <p>We have set the monitoring frequencies to be quarterly in the first year, as a conservative measure for a new installation, then reduce to 3 tests required (as BAT) per year.</p> <p>We made these decisions in accordance with Sector Guidance Note 2.03: Non-Ferrous Metals and the Production of Carbon and Graphite.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>These reporting requirements have been imposed in order to protect the surrounding environment from emissions to air and ensure compliance with the Emission Limit Values set in the permit.</p> <p>We made these decisions in accordance with Sector Guidance Note 2.03: Non-Ferrous Metals and the Production of Carbon and Graphite.</p>	✓
Operator Competence		
Environment	There is no known reason to consider that the operator	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
management system	will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.	✓
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: External Consultation and web publicising.

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

<i>Response received from</i>
<i>Severn Trent Water</i>
<i>Brief summary of issues raised</i>
<p>1. Comments regarding trade effluent discharge consent:</p> <p>This site has a discharge to sewer which is subject to a Trade Effluent Consent issued by Severn Trent Water Ltd. This site has not discharged anything to sewer yet. Therefore, it is difficult to comment on the effluent quality at this stage.</p> <p>2. Facility is located within groundwater Source Protection Zone 3 and outside known Drinking Water Safeguard Zone. Comments from our Hydrogeology Team: The processing plant is located on unconfined sandstone aquifer (high vulnerability). This may create a risk of direct pollution of the aquifer (as there is no overlying protecting layer to the aquifer) from spillage of liquid material on site, or from sewer leakage. However, overall judgement is that the increased risk to our GW sources above current risk is low, and we have no significant grounds to object on groundwater vulnerability. This is based on a judgement of several parameters:</p> <ol style="list-style-type: none">1) The processing plant already exists, and already has a trade effluent permit from STWL.2) The processing plant is located in an area of high industrial density; contamination risk of the aquifer underlying this area is already present irrespective of granting of this permit or not.3) The length of sewer between the trade effluent discharge and the receiving Kidderminster STW is short (~300-350m) meaning that the chance of sewer leakage of contaminants before the treatment works is presumably low (i.e. low length of network).4) Whilst the processing plant is located in Source Protection Zone 3 of the Blackstone and Green Street PWS Groundwater sources, they are located in separate aquifers to that below the processing plant, and are more than 400 days travel time in the aquifer away. This means that we should in theory have ample time to react if a contamination issue occurs before PWS becomes at risk. It may be that there is some hydraulic flow connection between the various aquifer units, but there are also several geological faults between the aquifer units which could inversely restrict flow between the aquifers. Irrespective of the connectivity or not between the aquifers from which our PWS abstract, and the aquifer underneath the processing plant, any leakage of the sewage network would be detected in sampling over several years from the PWS sources and would highlight leakage at a

catchment scale. As this is not and has not been observed historically, it suggests that there is not an issue with sewage leakage impacting the aquifer(s) in this area.

We therefore do not have reason to object to the permit application on a gw basis. There is a comprehensive Risk, Safety and Process document accompanying the Amtek application, which states that on site storage of liquids will occur, and that they will be stored in bunded containers. As part of the response, we should highlight that the unconfined sandstone in this area is very vulnerable to spillage of contaminants at the surface, and we should ensure that Amtek are aware of the importance of complying with their bunded storage process. We should highlight that they should also determine an appropriate tankering/filling process (if applicable) to mitigate risk and ensure that any spillage risk to ground is minimised during filling/tankering processes. In addition, we should also ensure that they are aware of Environmental reporting/POLWARN reporting process to the relevant regulatory bodies, to ensure protection of our customers, should a spillage at the site occur.

We have no further comments.

Please let me know if you have any questions.

Summary of actions taken or show how this has been covered

- We have assessed the impacts of the discharge to the sewer and have concluded that emissions can be classed as insignificant, this is discussed in more detail in the Environmental Risk section of this document.
- We have assessed this risk of leaks and spills and have concluded that the appropriate measures are in place, this is discussed in detail in the Environmental Risk section of this document
- The requirement for stored liquids to have suitable secondary containment in the form of bunds capable of holding 110% of the tanks capacity is included in the conditions of the permit.
- The supporting document provided by the applicant states the following with regards to the on-site liquid storage tanks
“Storage areas are designed so that leaks from the upper portions of tanks and from delivery systems are intercepted and contained in the bund. Tank contents are displayed and associated alarms used. Planned deliveries and automatic control systems will be employed to prevent over filling of storage tanks.”
This document has been included in the operating techniques section of the permit and thus must be implemented in order for the operator to comply with their permit conditions.
- The notification conditions contained in the permit will ensure that if the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately inform the Environment Agency and take

steps to minimise the environmental consequences.

Response received from

Local Fire Service

Brief summary of issues raised

The local fire service have inspected the site and the operator detailed the Fire Safety measures which are presently in place, and those which will be in place when the Premises are fully operational. These include:

- Current and Relevant Fire Risk Assessments.
- Fire Prevention Plan.
- Fire Action Plan – i.e. action to be taken in the event of a fire.
- Evacuation Plans.
- Interim measures for raising a Fire Alarm (Air Horns) – until the Full Alarm system (Type M – BS 5839-1) has been commissioned.
- Designated Means of Escape routes for employees within the premises.
- Fire Extinguisher provision.
- Staff training policies – including nominated Fire Marshalls

The measures detailed above, include those which the Fire Service would expect to be implemented in a premises of this type.

This consultation response is forwarded from a Technical Fire Safety perspective. I have passed on a copy of the original Environmental Permit Application Consultation to Hereford & Worcester Fire Service Operational Department, if they should wish to respond to.

Summary of actions taken or show how this has been covered

No concerns or issues raised

Response received from

Public Health England

Brief summary of issues raised

1. We recommend that any Environmental Permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: emissions to air from point sources, fugitive emissions and odour arising from smelting processes.
2. Based solely on the information contained in the application provided, PHE has no significant concerns regarding risk to health of the local population from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice.

Summary of actions taken or show how this has been covered
<p>1. Risk assessments for the emissions to air from point sources, fugitive emissions and odour have been submitted by the applicant, and we consider that these will not cause significant pollution. See the environmental risk section of this document for more details. Emission Limit Values have been included in the permit to control emissions to air from the point source. Fugitive emissions (excluding odour) will be controlled by permit conditions for ‘emissions of substances not controlled by emission limits’; which set a requirement that these emissions shall not cause pollution and if notified that they are, an emissions management plan is required to be submitted and implemented. Odour emissions from the site will also be controlled by permit conditions in the same way as ‘emissions of substances not controlled by emission limits’.</p> <p>2. The operator has stated they will operate in line with the Environment Agency’s guidance notes:</p> <ol style="list-style-type: none"> How to Comply Sector Guidance Note EPR 2.03: Non-ferrous metals and the Production of Carbon and Graphite Sector Guidance Note EPR 5.06: Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metal Industries – Industrial Emissions Directive 2010/75/EU IPPC <p>As discussed in the “operating techniques section” of this document, the proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility</p>

Response received from
Worcestershire Local Authority
Brief summary of issues raised
Dear Sir/Madam,
With regard to the above application we have reviewed documentation pertaining to noise prediction and control for the proposed activity and confirm that we have no adverse comments to make.
Summary of actions taken or show how this has been covered
No concerns or issues raised

Response received from
Natural England
Brief summary of issues raised
An Appendix 4 assessment has been sent for consultation.

Summary of actions taken or show how this has been covered

Natural England are in agreement with our decisions as laid out in document 'Appendix 4'.