

EP Permit ref GC/16/00002/A2

Variation ref GC/16/00001/A2/V4

GLOUCESTER CITY COUNCIL

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2016 (As Amended)

Variation Notice

To Avon Metals Ltd, Ashville Road, Gloucester, GL2 5DA, Gloucester City Council ("the Council"), in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 ("the 2016 Regulations") hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference GC/16/00002/A2 granted under regulation 13(1) of the 2016 Regulations (dated 10th February 2020) in respect of the operation of the installation at Avon Metals Ltd, Ashville Road, Gloucester, GL2 5DA.

The variation of the conditions of the permit and the date on which they are to take effect are specified in Schedule 1 to this notice. A consolidated permit as varied by this notice is set out in Schedule 2.

Signed on behalf of Gloucester City Council



Dated: 9.5.2024

Gupti Gosine

An Authorised officer of the Council


EP Permit ref: GC/16/00002/A2

Variation ref: GC/16/00001/A2/V4

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place.
<p>Condition 1.1 & Table 1 Amended to include Ferrous Metals (Part B)</p> <p>Table 1.2 (Waste Codes) Added.</p> <p>Condition 1.2 modified.</p> <p>Condition 2.1 modified.</p> <p>Condition 3.1 modified.</p> <p>Condition 3.12 modified.</p> <p>Condition 4.1 modified.</p> <p>Condition 5.1 modified.</p> <p>Condition 5.2 modified.</p> <p>Condition 7.1 deleted, Conditions 7.2 & 7.3 re-numbered.</p> <p>Condition 8.1 (Resource Utilisation) modified.</p> <p>Condition 9.4 deleted.</p> <p>Condition 10.2 modified.</p> <p>Condition 10.3 modified.</p>	<p>9th May 2024</p>

Condition 10.7 modified.	
Condition 11.2 modified.	
Condition 11.5 (Accident Management) modified.	
Table 3 (Submissions and further requirements) deleted.	



Dated 9.5.24

Gupti Gosine,

An Authorised Officer of the Council

EP Permit ref: GC/16/00002/A2

Variation ref: GC/16/00001/A2/V4

Schedule 2

Permit reference GC/16/00002/A2 as varied by this notice

GLOUCESTER CITY COUNCIL

POLLUTION PREVENTION AND CONTROL ACT 1999

Environmental Permitting (England and Wales) Regulations 2016 (as amended)

Permit ref. no: GC/16/00002/A2

Name and address of person (A) authorised to operate the installation ('the operator')

Avon Metals Ltd, Ashville Road, Gloucester, GL2 5DA

Registered office of company

Avon Metals Ltd, Ashville Road, Gloucester, GL2 5DA

Registered number of the company

04135396

Address of permitted installation (B)

Avon Metals Ltd, Ashville Road, Gloucester, GL2 5DA

The installation boundary and key items of equipment mentioned in permit conditions are shown in the plan reference GC/16/00002/A2 (Map 1), and GC/16/00002/A2 (Drawing 1) attached to this permit.

Gloucester City Council hereby permit Avon Metals Limited in accordance with the following conditions numbered 1.1-12.2 inclusive, within the installation boundary as marked in red on the attached plan reference GC/16/00002/A2 (Map 1) to carry out a Non-Ferrous Metals activity under section 2.2 Part A2 and a Ferrous Metals Activity under Section 2.1 Part B of Schedule 1, Part 2 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

Introductory Note - which does not form part of the permit.

Any reference in this permit to the 'regulator' shall mean Gloucester City Council. The following permit is issued under the Environmental Permitting (England and Wales) Regulations 2016 (the EP Regulations). This permit allows the named operator to operate an installation carrying out one or more of the activities listed in part 2 of schedule 1 of the EP Regulations, to the extent authorised by the Permit.

The Permit includes conditions that must be complied with. Failure to comply with the conditions within the Permit means Gloucester City Council may take enforcement action against the Operator. It should be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the guidance and recommendations detailed within the Sector Guidance notes IPPC SG 4, 2006, COMMISSION IMPLEMENTING DECISION (EU) 2016/1032 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the non-ferrous metals industries and subsequent, and/or supporting guidance and Process Guidance Note 2/03(13) Electric Furnaces. The 'operator' shall use the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. For an interpretation of 'best available techniques' see Annex VIII of '*General Guidance Manual on Policy and Procedures for A2 and B Installations Part B of Manual*'

Effective control of emissions requires the maintenance and proper use of equipment, and the proper supervision of the process operations. Adequate preventative maintenance should be undertaken on all plant and the equipment concerned with the control of emissions. Essential spares and consumables should be held or should be available at short notice from guaranteed local supplies.

Staff at all levels should receive the necessary formal training and instructions in their duties relating to control of the process and emissions. Particular emphasis

should be given to training for start-up, shut down and abnormal conditions. Good housekeeping should be practised at all times.

This document has been drawn up with reference to the Secretary of State's Guidance 'General Guidance Manual on Policy and Procedures for A2 and B Installations'

Activity Description

The Permitted Activity is one involving the manufacture of non-ferrous alloys (e.g. Aluminium, Copper, Nickel, Cobalt, Titanium etc.) and Ferrous Alloys, including the manufacture of new alloys from Primary and Secondary metals in a plant that has a melting capacity of more than 4 tonnes per day for lead or cadmium or 20 tonnes per day for all other Non-Ferrous Metals. No furnace (other than a vacuum furnace), bath or other holding vessel, used in the plant for the melting non-ferrous metals, has a designed holding capacity of 5 or more tonnes. In this permit the 'permitted activity' comprises the whole operation including the treating, processing, handling and storage of any materials used in the products and wastes produced by the activities within the installation boundary as marked in red on the attached plan reference: GC/16/00002/A2 Map 1.

The main purpose of the activity at the installation is the melting of sorted secondary metals with other primary metals to manufacture non-ferrous & ferrous based alloys.

The installation includes:

Raw material storage of primary and secondary scrap metals, processing and handling operations.

The melting and processing of primary and secondary scraps and associated alloying metals.

The casting of alloys into sow, ingots/waffles/pebbles, splatter/lump and shot. Stacking, packing and despatch operations.

Raw Materials

The principal raw material for the process is primary and secondary/scrap metals. The metals are obtained from external suppliers and transported by road to the installation site. All incoming metal is directed to the weighbridge where it is initially inspected to ensure the load confirms to the purchase order and delivery note. The metals are selected, sorted and processed as appropriate for use in specific bays ready for furnace charging or resale. All metals and associated alloying metals are stored on site.

Metal melting

The installation operates the following melting operations:

Foundry 1

1. Four gas fired reverberatory furnaces
2. One gas fired tower furnace.

Foundry 2

1. 1 electric induction inverters.
 - a. 3 East Inverter – 1 pot

Foundry 3

1. Two gas fired tower furnaces.
2. One electric induction inverter.
 - a. West Inverter – 2 pots

Foundry 4

1. One electric induction inverter.
 - a. 1 & 2 East Inverter – 2 pots

Foundry 5

1. One electric induction inverter.
 - a. 1, 2 & 3 Aerospace Inverter – 3 pots

General

1. One mobile electric resistance holding furnace.

In Total

- 4 gas reverberatory furnaces
- 3 gas tower furnaces
- 4 electric induction inverters serving 8 melting pots
- 1 mobile electric resistance holding furnace.

The furnace fumes from the Foundry 1, Foundry 2, and Foundry 4 are extracted via a Gwyn Thomas (GT) baghouse fume abatement plant. The foundry fumes from Foundry 3 Induction Pots and Foundry 5 are extracted via a DISA filter plant. Both the GT and DISA units will discharge filtered air via one main stack. The filter bags in both units are cleaned by reverse air jets.

Only clean metal will be charged to Foundry 3 tower furnaces, exhausts from these furnaces will be vented directly to atmosphere by a single hygiene stack.

Samples of the melts are collected and analysed in the laboratory to check chemical composition. Base metals or master alloys are added to achieve the required finished product chemical specification.

Dross from the reverberatory furnaces is removed by forklift truck into dross pans to cool and then transferred into skips ready for external reprocessing. Dross from the Induction Furnaces and Tower Furnaces is removed by hand into dross pans to cool and then transferred to dross skips ready for external reprocessing.

Casting

All furnaces allow pouring from the furnace spout into a transfer ladle or launder systems feeding inclined track casters with cast iron moulds or static cast iron moulds of various shapes e.g. sow, ingot, broken ingot (lump) or onto splatter/shot casters for the manufacture of splatter (thin broken plates)/shot.

Cooling water and site drainage

Ingots are allowed to drop out of the moulds at the end of the casting track into steel stillages or similar containers, sows are tipped from their moulds once cooled and solidified, splatter/shot is collected in the caster receiving troughs and thereafter removed for sorting and packaging. Water cooling is optional on all the casting equipment as required. Water for this purpose is extracted from the mains supply and sprayed onto the alloys via a sprinkler system. Most of the water escapes as steam and the minimal excess is collected into a tray under the casting track. Any wastewater from this activity naturally evaporates and any excess water may be discharged to sewer. Any metal splashes or flashings formed in the tray are removed and recycled in one of the furnaces.

Formed metal is allowed to cool fully in the yard area before being moved to the packing area.

Storage and dispatch

Cast product is packed onto pallets, stillages, drums or bags for subsequent transportation by road haulage to the customer or to port for further shipping via sea or air to international customers. Some packages may be shrink wrapped depending on the customer's requirements.

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PERMIT CONDITIONS

1 The Permitted Installation

1.1 The 'operator' is permitted to carry out the activities specified in Schedule 1, Part 2, Chapter 2, Section 2.2, Part A2 and Section 2.1 Part B of The Environmental Permitting (England and Wales) Regulations 2016. The permitted activities and associated activities are detailed in Table 1 below.

Activity under Schedule 1 of The Regulations/ Associated Activity	Description of specified activity	Schedule 1 activity reference (if applicable)	Limits of specified activity
All raw materials receipt, storage and handling	Raw materials received from suppliers. Storage of raw Materials	Directly associated activity	See EWC list Table 1.2 for permitted Scrap Codes
Melting of Non-Ferrous Metals	Operation of furnace systems	Section 2.2 A2	Charging of Non-Ferrous metals and Ferrous metal for alloying into furnaces. Discharge of fumes via particulate abatement plant
Melting Ferrous Metals	Operation of furnace systems	Section 2.1 B	Charging of Ferrous Metals and Non-Ferrous metal for alloying into furnaces. Discharge of fumes via particulate abatement plant.
Casting of Non-Ferrous Metals		Directly associated activity	Casting of Non-Ferrous Metals
Casting of Ferrous Metals		Directly associated activity	Casting of Ferrous Metals
Storage and dispatch of processed Non-Ferrous & Ferrous Metals		Directly associated activity	
Storage and dispatch of waste materials		Directly associated activity	See EWC list Table 1.2 for allowable Scrap Codes

Table 1.2 Permitted EWC codes for Recycling and Recovery	
WASTE CODE	DESCRIPTION
10	WASTES FROM THERMAL PROCESSES
10 03	wastes from aluminium thermal metallurgy
10 03 15	skimmings that are flammable or emit, upon contact with water, flammable gases in hazardous quantities
10 03 16	skimmings other than those mentioned in 10 03 15
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 02	ferrous metal dust and particles
12 01 03	non-ferrous metal filings and turnings
12 01 04	non-ferrous metal dust and particles
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
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 17	ferrous metal
16 01 18	Non-ferrous metal
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 05	iron and steel
17 04 07	mixed metals
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 40	metals

- 1.2 No furnace, bath or other holding vessel used in the installation for melting non-ferrous metals shall have a design holding capacity of 5 tonnes or more.
- 1.3 The activities permitted under condition 1.1 shall not extend beyond the installation boundary, as marked in red on the attached plan reference GC/16/00002/A2 (Map 1).

2 Management techniques and control

- 2.1 A competent person(s) shall be appointed as the primary point of contact with the regulator and the public with regard to complaints.
- 2.2 The results of all non-continuous monitoring, maintenance, checks, inspections and assessments shall be recorded in a log, retained by the operator for a minimum period of 2 years and made available for examination by the regulator. The log shall contain:-
 - a. time and date of all assessments and inspections
 - b. the results indicating whether they are adverse or satisfactory
 - c. in the event of there being abnormal emissions details of duration, cause and corrective action taken.
 - d. name of the person undertaking the assessment.
- 2.3 All records made and kept in accordance with this Permit shall;
 - Be legible;
 - Be made as soon as reasonably practicable;
 - Indicate any amendments that have been made to the records and shall include the original record wherever possible.
 - be made available for inspection by the Regulator at any reasonable time
- 2.4 The operator shall notify the regulator in writing of any proposed changes in operation of the installation at least 14 days before making the change. The notification shall contain a description of the proposed change in operation.

It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

- 2.5 The best available techniques shall be used to prevent or reduce emissions from the installation in relation to any aspect of the activities at the installation, which is not regulated by any other condition of this permit.

- 2.6 The Operator shall use an effective Environmental Management System (EMS) with policies and procedures for environmental compliance and improvements. The EMS shall include a complaints procedure for recording any complaints concerning the installations alleged emissions to the environment. Audits shall be carried out on an annual basis and submitted to the regulator within 4 weeks of the annual audit having been undertaken. Information from these audits, reviews and assessments shall be used to establish benchmarks. Operators shall keep records of such benchmarks and make measurement against them to reveal whether the process is being maintained "in control" or to track improvements.

3 Monitoring and Emission Limits

3.1 Emissions to air at the single discharge point of the GT Baghouse and the DISA Baghouse shall not exceed the emission limits specified for specific processes set out in Table 2 below.

Table 2				
Pollutant	Emission Limit	Type of Monitoring	Frequency of Monitoring	Applicable To
Total particulate matter	5mg/Nm ³	Indicative plus extractive monitoring to BS EN 13284-1	Continuous Daily Average: Average over a period of 24 hours of valid half-hourly or hourly averages obtained by continuous Measurements. & Annually	All furnace operations (except the tower melters) - charging, fluxing, melting, pouring
Chloride (expressed as hydrogen chloride)	5mg/Nm ³	Manual extractive testing	Annually	All furnace operations - charging, fluxing, melting, pouring
Fluoride (expressed as hydrogen fluoride)	1mg/Nm ³	Manual extractive testing	Annually	All furnace operations - charging, fluxing, melting, pouring
Total Volatile Organic Compounds (expressed as total carbon)	10mg/m ³	Manual extractive testing	Annually	All furnace operations Processing contaminated secondary raw materials.
Polychlorinated dibenzo-p-dioxins and dibenzofurans (17 congeners)	0.1ng I-TEQ/Nm ³	Manual extractive testing BS EN 1948:1997: Parts 1, 2 & 3	Annually	All furnace operations Processing contaminated secondary raw materials.
Where available, operators shall use monitoring equipment and instruments certified to MCERTS and use a stack-testing organisation accredited to MCERTS standards or such alternative requirements as approved by the regulator.				

Monitoring to determine compliance with emission limit values shall be corrected to the following standard reference conditions: dry gas at a temperature of 273.15 K (0°C) and a pressure of 101.3 kPa (1 atmosphere).

- 3.2 The introduction of dilution air to achieve emission concentration limits shall not be permitted.
- 3.3 The final efflux velocity of all emissions from the final point of discharge to atmosphere serving the emission points listed in Table 2 shall be a minimum of 15m/s.
- 3.4 Stacks shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone which may be necessary to increase the exit velocity of the emissions.
- 3.5 All releases to air, other than condensed water vapour, shall be free from droplets and persistent visible emissions with the exception of one-off events during start-up and shutdown. All emissions from combustion processes in normal operation shall not exceed the equivalent of Ringelmann Shade 1 as described in British Standard BS 2742:2009.
- 3.6 All reasonably practicable steps shall be taken to minimise the duration and visibility of emissions during start up and shut down, and changes of fuel or combustion load in order to minimise emissions.
- 3.7 The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.
- 3.8 The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling. Results from continuous monitoring systems shall be recorded and be made available for inspection by the regulator.

3.9 All results submitted to the regulator shall include details of process conditions at the time of monitoring, monitoring uncertainty as well as any deviations from the procedural requirements of standard reference methods and the error invoked from such deviations.

3.10 In the event of adverse results from any monitoring activity or in the event of abnormal emissions, or malfunction or breakdown likely to or leading to an emission the Operator shall undertake the following actions:

- Investigate the cause immediately;
- Carry out corrective action as soon as is practicably possible;
- If relating to stack testing, undertake re-testing to demonstrate compliance in agreement between the regulator and operator;
- If relating to abnormal emissions, adjust the process or activity to minimise those emissions. Should corrective action prove ineffective the process shall be shut down in a controlled manner and the regulator informed of the outcome.
- Record details regarding the cause and extent of the problem and the action taken to rectify the situation as soon as reasonably practicable;
- Records of breakdowns and plant failure shall be analysed in order to identify trends and eliminate common failures

For the purpose of this condition, abnormal emissions are emissions to air, land, sewer or groundwater, including noise, that have the potential to have an adverse impact beyond the boundary of the installation.

3.11 The Operator shall notify the Regulator without delay and no later than 10.00 hours on the next working day of:-

- The failure of key abatement plant (such as bag filtration units);
- Any monitoring activity (both continuous and non-continuous) showing an emission concentration exceeding the limit value;
- Any event or incident that has caused, or is likely to have an effect on the environment.

A detailed written report of the circumstances, and remedial actions taken shall be submitted to the regulator within 7 days of the incident occurring.

- 3.12 Sampling points shall be designed to comply with CEN or Other Standards. e.g. BS EN 13284-1 or BS ISO 9096: 2003 for sampling particulate matter in stacks
- 3.13 All Operations, including cleaning operations, shall be controlled to minimise fugitive emissions in accordance with the policies and procedures of the EMS detailed in condition 2.6.
- 3.14 All furnace operations shall be monitored for melt temperature.
- 3.15 The Operator shall ensure that all operations which generate point source emissions to air are contained and adequately extracted to suitable abatement plant, where this is necessary to meet specified emission limits in Table 2.
- 3.16 Exhaust flow rates of waste gases shall be consistent with the efficient capture of emissions.

4 Materials handling

- 4.1 A quality control system to include random sampling shall be used to identify raw material quality as detailed in the EMS policies and procedures.

5 Maintenance

- 5.1 Environmentally critical processes and abatement equipment (whose failure could impact on the environment) shall be identified and listed.

For equipment referred to above:

- Alarms or other warning / management systems shall be provided, which indicate equipment malfunction or breakdown;
- Where alarms or other warning systems are used they shall be maintained and checked to ensure continued correct operation, in accordance with the manufacturer's recommendations;
- Essential spares and consumables for such equipment should be held on site or be available at short notice from suppliers.

- 5.2 A schedule of preventative maintenance shall be kept on site and made available for inspection on request from the regulator. Maintenance shall be carried out in accordance with the approved method and a record of such maintenance shall be kept in accordance with condition 2.2. The preventive maintenance schedule shall be reviewed annually and updated as necessary.

The maintenance/check schedule shall include as a minimum;

- Preventative maintenance of the gas burners in the reverberatory furnaces to ensure efficient combustion.
- Annual inspection of the process buildings, ancillary plant and open yards/storage areas including the impermeable surface covering the installation
- Inspection of all tanks, bunds and sumps and preventative maintenance methods to prevent emissions to ground, water and soil.
- Inspection and maintenance of all interceptors. Prior to inspection all contents shall be removed

- Inspection and maintenance of flues and ductwork in order to prevent accumulation of materials.

5.3 Oil and solid interceptors shall be used if necessary for the drainage of open storage areas.

6 Odour

6.1 The Operator shall undertake visual and olfactory assessments of emissions from the installation for a continuous period of at least 5 minutes for every 24 hours of operation of the plant at locations downwind of the processes on the installation boundary.

6.2 Should any persistent offensive process odours occur beyond the installation boundary an odour control and management plan will be required in agreement with the regulator.

7 Noise

7.1 The approved Noise Management Plan (NMP) shall be maintained and include the following;

- Identify and assess the impact of all static and mobile equipment and the manoeuvring of materials around the site including the charging and movement of stillages and tipping of finished product.
- An inventory of noise sources for the site and an assessment of site noise emissions from the installation using British Standard 4142:2014+A1:2019. The assessment methodology and off-site measurement locations shall be agreed with the Regulator prior to the commencement of any acoustic measurements.
- Detail of any activity with restricted hours of operation as agreed by the regulator.

7.2 The NMP shall be reviewed annually for BAT compliance and any actions identified shall be implemented in agreement with the Regulator.

7.3 Installation of new plant or machinery at the premises shall be assessed for noise emissions and where necessary attenuated acoustically (where feasible) so as to minimise noise emissions.

8 Resource Utilisation

8.1 An annual systematic assessment of the raw material, energy, fuel and water consumption, emissions, received waste and waste production (in accordance with Article 4 of Directive 2008/98/EC on waste) associated with the permitted installation shall be undertaken. The purpose of the assessment shall be to identify whether there are suitable alternative methods of reducing raw material, including metals, water use, energy and fuel consumption, emissions and waste production including the identification of methods of avoiding or reducing the impact on the environment of the disposal of waste (in accordance with Article 4 of

Directive 2008/98/EC on waste). Each assessment shall be recorded and shall be submitted to the Regulator within 8 weeks of its completion.

8.2 Specific improvements resulting from the assessment undertaken in accordance with Condition 8.1 above shall be carried out within a timescale approved by the regulator.

9 Waste management

9.1 The assessment required in condition 8.1 (resource utilisation) shall include an inventory of the quantity, nature, origin and where relevant, the destination, frequency of collection, mode of transport and treatment method of any waste which is disposed of or recovered. The assessment shall also include;

- the physical description of the waste
- a description of the composition of the waste
- any relevant hazardous properties (hazard and risk phrases)
- European Waste Catalogue code
- handling precautions and substances with which it cannot be mixed
- recovery or disposal routes for each waste category

9.2 The operator shall ensure that waste storage areas are clearly marked and signed, and that containers are clearly labelled.

9.3 Operators shall ensure that, where waste is stored in containers, the containers are durable for the substances stored and that incompatible waste types are kept separate.

10 Protection of Land, Water and Groundwater

10.1 There shall be no emission of List I and List II substances as defined by the Water Framework Directive to water, groundwater or soil from the permitted Installation. Any incident that has or might have impacted on the condition of the soil or groundwater shall be recorded where further investigation or

remediation work will be required. This record shall be kept until the permit is surrendered.

- 10.2 The operator shall maintain a clear diagrammatic record of the routing of all installation drains, subsurface pipework, sumps and storage vessels that are used or have been used within the installation boundary, as shown on the attached Site Drainage Plan.
- 10.3 The Operator shall identify the potential risk to the environment from drainage systems recorded in condition 10.2 and shall devise an inspection and maintenance programme having regard to the nature and volume of waste waters, groundwater vulnerability and proximity of drainage systems to surface waters.
- 10.4 The operator shall ensure that all operational and storage areas are equipped with an impervious surface, spill containment kerbs, sealed construction joints, and connected to a sealed drainage system or such alternative requirements as approved by the regulator.
- 10.5 All sumps shall be impermeable and resistant to stored materials.
- 10.6 All tanks or storage containers used to store any potentially environmentally hazardous liquid shall be located within a bund. The minimum capacity of any bund shall be either 110% of the capacity of the largest container within the bund, or 25% of the total capacity of all the containers within the bund, which-ever is the greater. In the event of any containers being connected to one another, they shall be treated as one container.

Storage tanks shall be fitted with high-level alarms or volume indicators to warn of overfilling and where practicable the filling system should be interlocked to the alarm system to prevent overfilling. Delivery connections shall be located within a bunded area, fixed and locked when not in use.

- 10.7 Spillages of oils, dusts or other potentially contaminative substance including firewater shall be dealt with in accordance with the approved Spill and Firewater Procedure.
- 10.8 Suitable and sufficient spill response equipment shall be provided at appropriate locations around the installation and staff shall be trained on their use.
- 10.9 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

11 Training / Accident prevention

- 11.1 A formal structure shall be provided to clarify the extent of each level of employee's responsibility with regard to the control of the process and its environmental impacts. A copy of the formal structure should be prominently displayed within the process building at all times. Alternatively, there must be a prominent notice referring all relevant employees to where the information can be found.
- 11.2 Personnel at all levels shall be fully conversant with those aspects of the Permit conditions which are relevant to their duties. All staff shall be provided with appropriate training and written operating instructions to enable them to carry out their duties. Staff shall also be made aware of all potential environmental effects of the operation of the Installation under both normal and abnormal circumstances. Such training shall be recorded and available for inspection by the regulator.
- 11.3 The potential environmental risks posed by the work of contractors shall be assessed and instructions provided to contractors about protecting the environment while working on site.
- 11.4 A copy of this Permit shall be available on site at all times for reference by all staff carrying out work subject to the requirements of the Permit.

- 11.5 Written notification shall be made to the regulator of any material changes to the approved Accident Management Plan. It shall be made available for inspection by the Regulator upon request.
- 11.6 The Operator shall use safe systems for the processing of materials in order to minimise the risk of fire or explosion.

12 Decommissioning

- 12.1 Prior to site operations ceasing, the Operator shall devise and submit to the Regulator for written approval, a scheme of works for decommissioning the site. The site shall not be decommissioned until the scheme has received written approval.
- 12.2 Prior to cessation of Permitted activities, the Operator shall submit a method statement for intrusive sampling of the site to the Regulator. Once agreed, the Operator shall carry out the intrusive sampling and forward the results within 8 weeks of the sampling to the Regulator. The Operator shall then undertake remediation of the land to an agreed level, within timescales agreed in writing by the Regulator, in order to remove contamination that may be attributable to Permitted activities.

Interpretation of Terms

For the purposes of this Permit, and unless the context requires otherwise, the following definitions shall apply:

Any term or expression already defined in the Regulations shall be taken to have the same meaning as provided in the Regulations;

“Duly Authorised Officer” means a person who is authorised in writing under Section 108 of the Environment Act 1995 to carry out duties on behalf of Gloucester City Council;

“incident” means any of the following situations:

- Where an accident occurs which has caused or may have the potential to cause pollution;
- Where any malfunction, breakdown or failure of plant or techniques is detected which has caused or may have the potential to cause pollution;
- A breach of any condition of this Permit;
- Where any substance, vibration, heat or noise specified in any Condition of this Permit is detected in an emission from a source not authorised by a Condition of this Permit and in a quantity which may cause pollution;
- Where an emission of any pollutant not authorised to be released under any Condition of this Permit is detected;
- Where an emission of any substance, vibration, heat or noise is detected that has exceeded, or is likely to exceed, or has caused, or is likely to cause to be exceeded any limit on emissions specified in a Condition of this Permit.

“I-TEQ” means the International toxic equivalency derived by applying international toxic equivalence factors, as defined in Annex VI, part 2 of Directive 2010/75/EU

“Location Plan” means the plan attached in GC/16/00002/A2 (Map 1) of this Permit;

“the Permitted Activities” are defined in the introductory note of this Permit;

“the Permitted Installation” is shown in red on GC/16/00002/A2 (Map 1) of this Permit;

“the Regulations” means The Environmental Permitting (England and Wales) Regulations 2016 as amended;

“Regulator” means Gloucester City Council;

“the Site Boundary” is defined in red on the attached plan reference GC/16/00002/A2 (Map 1) on this Permit;

“Site Plan” means the plan attached at GC/16/00002/A2 (Drawing 1)

“systematic assessment” means an assessment undertaken in a methodical and planned manner.

“water environment” has the same meaning as in the Water Resources Act 1991 and Groundwater (England and Wales) Regulations 2009, that is all surface water, groundwater and wetlands; and “surface water”, “groundwater” and “wetlands” shall have the same meanings as in the Act.

“writing” includes electronic communication within the meaning of section 15 (general interpretation) of the Electronic Communications Act 2000;

Any reference to a numbered Condition, group of Conditions, Schedule, Table, Appendix, Figure or Paragraph is a reference to the condition, group of conditions, schedule, table, appendix, figure or paragraph bearing that number in this Permit;

Except where specified otherwise in this Permit:

- “day” means any period of 24 consecutive hours,
- “week” means any period of 7 consecutive days,
- “month” means a calendar month,
- “quarter” means a calendar quarter
- “year” means any period of 12 consecutive months;
- “calendar year” means a period of 12 consecutive months ending on 31 December and any derived words (e.g. “monthly”, “quarterly”) shall be interpreted accordingly;

Except where specified otherwise in this Permit, any reference to an enactment or statutory instrument includes a reference to it as amended (whether before or after the date of this Permit) and to any other enactment, which may, after the date of this Permit, directly or indirectly replace it, with or without amendment.

Gloucester City Council (The Regulator) in exercise of its powers under Regulation 13 of the Environmental Permitting (England & Wales) Regulations 2016 (as amended) hereby permits:

Avon Metals Limited

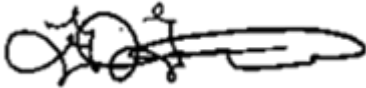
Whose registered office is:

Avon Metals Ltd. Ashville Road, Gloucester, GL2 5DA

To operate an installation at:

Ashville Road, Gloucester, GL2 5DA

To the extent authorised by and subject to the conditions of this Permit and operated within the installation boundary outlined in the attached plan GC/16/00002/A2 (Map 1).



Dated: 9th May 2024

Gupti Gosine
An Authorised Officer of the Council

.....END OF PERMIT.....

Explanatory Notes

These notes do not form part of the permit.

Introduction

This Permit is issued on the basis that the information provided by the applicant in support of the application for Permitting was neither false nor misleading. Any change affecting the accuracy of such information shall be promptly notified, in writing, to Gloucester City Council, Public Protection, Herbert Warehouse, The Docks, Gloucester, GL1 2EQ.

This Permit must not be taken to replace any responsibilities the operator has under workplace health and safety legislation. Neither does it detract from any statutory requirement such as the need to obtain Planning Permission, Building Regulations approval, hazardous substances consent, or discharge consent from the water resources regulator.

The Permit includes conditions that must be complied with. It should be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the best available techniques, BAT, which shall be used to prevent or where that is not practical, reduce the emissions from the installation.

Please refer to “BAT Definitions” below.

Information

Your attention is drawn to the following publications that are relevant to your process:

- i. Environmental Permitting (England and Wales) Regulations 2016 SI No 675 as amended
- ii. The Pollution Prevention and Control Act 1999
- iii. Council Directive 2010/75/EU of the European Parliament and of the Council on the 24 November 2010 on industrial emissions (integrated pollution prevention and control)
- iv. Commission Implementing Decision (EU) 2016/1032 of 13 June 2016 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the non-ferrous metal industries.
- v. Council Directive 67/548/EEC of 27th June 1967 on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of Dangerous Substances also known as the Dangerous Substances Directive.
- vi. Sector Guidance Note IPPC SG04 ‘
- vii. General Guidance Manual on Policy and Procedures for A2 and B Installations’

1. BAT – Definitions

BAT is defined in Article 3(10) of the Industrial Emissions Directive 2010/75/EC. As follows:

"Best available techniques" means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing the basis for emission limit values and other permit conditions designed to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole.

"available techniques" means those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator.

"best" means most effective in achieving a high general level of protection of the environment as a whole.

"techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

In the context of this permit, 'activity' comprises the whole activity including the treating, handling and storage of any materials used and products and waste produced by the activity.

Gloucester City Council is statutorily obliged to include conditions in any permit they issue which are designed to ensure the activity is operated using the 'Best Available Techniques'. EP regulations principles are that 'Installations should be operated in such a way that:

- (a) all appropriate preventative measures are taken against pollution, in particular through the application of best available techniques (BAT);
- (b) no significant pollution is caused';
- (c) The best available techniques shall be used to prevent or where that is not practical, reduce the emissions from the installation in relation to that aspect of the operations of the installation which is not regulated by any other condition of this permit.

In considering BAT, Gloucester City Council would expect the operator to have regard to all relevant EPR sectoral or other technical guidance, including BAT Conclusions and BAT Reference Documents published by the European Commission and technical guidance published by Natural Resources Wales, the Environment Agency and other relevant regulatory authorities.

2. APPEALS

You have the right of appeal against this permit within 2 months of the date of the decision. The Council can tell you how to appeal. You will normally be expected to pay your own expenses during an appeal.

You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates Court is an unlimited fine and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Our enforcement of your permit will be in accordance with the Regulators' Compliance Code.

SUMMARY OF KEY DATES

Action	Date	Reason
First issue of Part B Permit	16 th February 1993	Following application Permit ref EPA/6/92
Issue of A2 Permit	5 th November 2003	Change of regulation Permit ref PPCA2-1-03
Variation/reissue	26 th September 2006	Variation to plant and improvement of clarity Permit ref PPCA2-1-03
Variation/reissue	31 st May 2012	Variation to plant and improvement of clarity Permit ref A2/1/4
Variation/reissue	9 th September 2015	General updating Permit ref EP/A2/001
Variation: GC/16/00001/A2/V1	15 th March 2017	Updated permit in accordance with SG note and BAT. New permit ref GC/16/00002/A2
Variation:	10 th September 2019	TVOC monitoring added, condition 10.9, relating to

GC/16/00001/A2/V2		groundwater and soil monitoring, added. Condition 2.6 varied.
Variation: GC/16/00001/A2/V3	10 th February 2020	Table 2 amended for dust emissions monitoring. Condition 1.10 varied to include emissions to water. I-TEQ Definition added to Interpretation of Terms
Variation: GC/16/00001/A2/V4	9 th May 2024	Revised Site Plan. Part B Ferrous Metals Added. EWC Table Added. Permit conditions Updated.

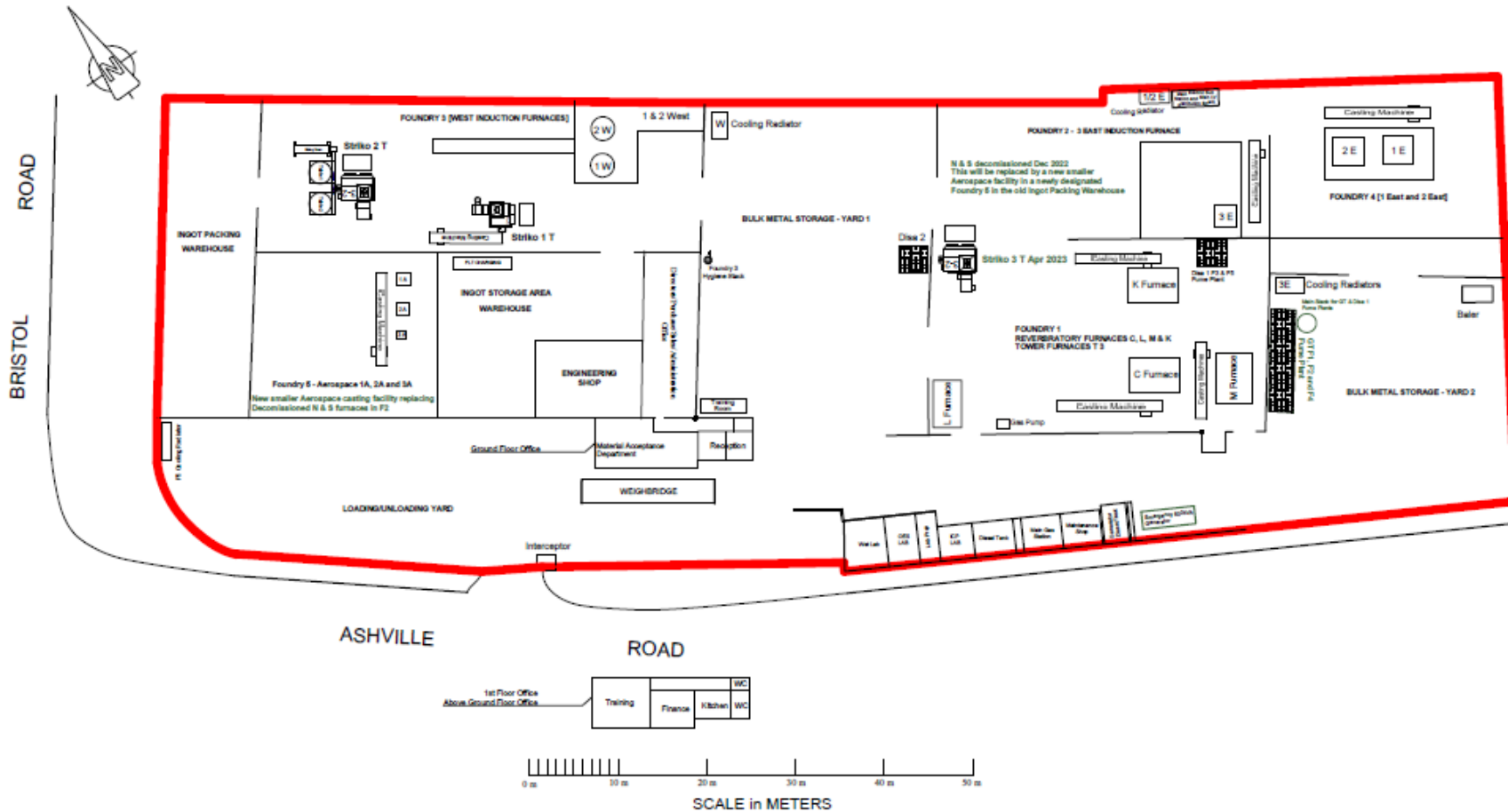
GC/16/00002/A2 (Map 1) Location and Installation boundary



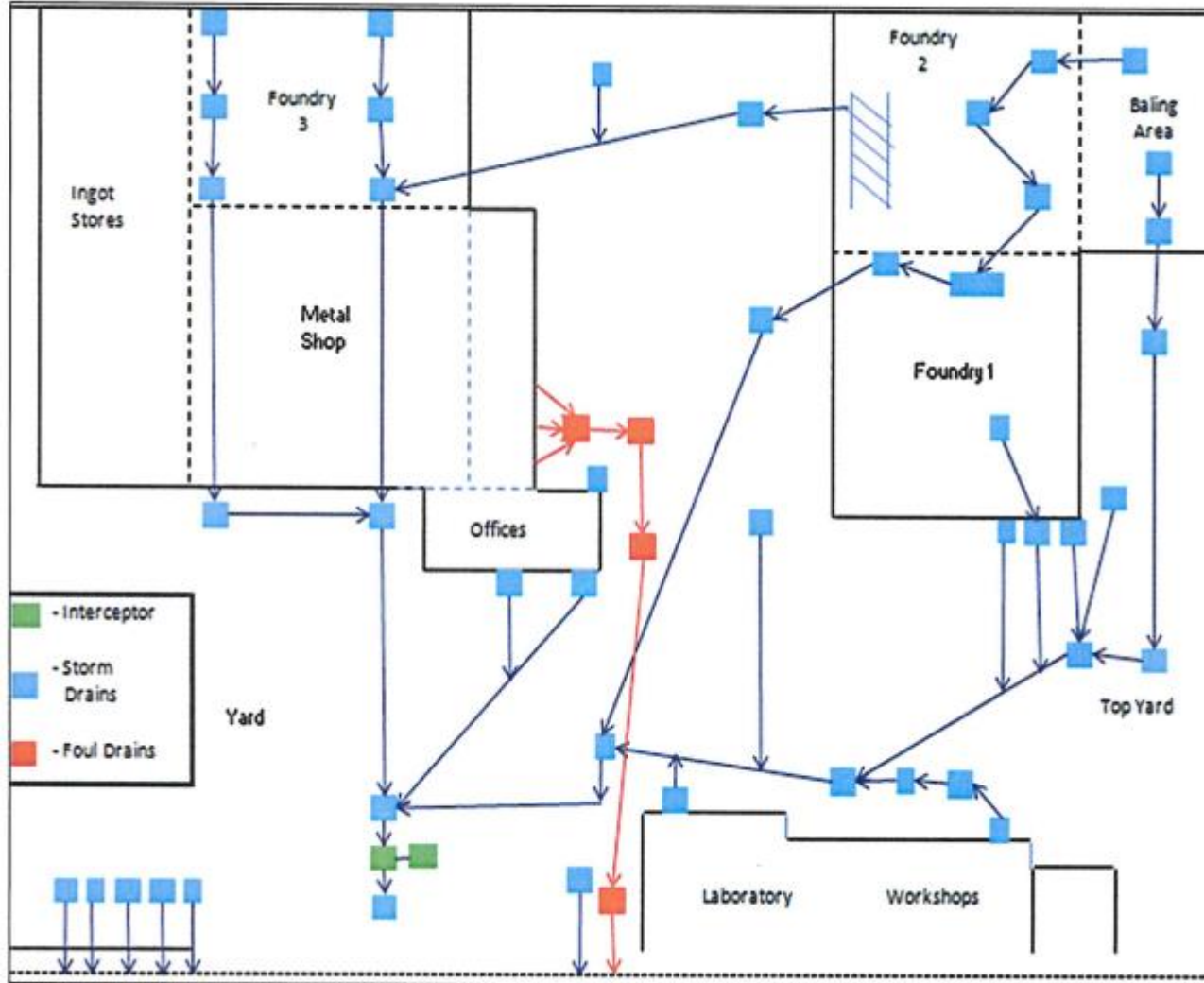
AVON METALS LTD

GENERAL SITE LAYOUT - ASHVILLE WORKS

GC/16/00002/A2 Drawing 1 Rev 6-2 Feb-24



Site Drainage Plan



Confidentiality

An operator may request certain information to remain confidential, i.e. not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.