

2. Non-Technical Summary

To satisfy question 5c of application form Part C2, the text below provides a non-technical summary of the proposed changes requested in this variation application.

AMG is permitted under the Environmental Permitting (England & Wales) Regulations 2016 as amended, to operate a number of activities and Directly Associated Activities (DAAs) under a number of Environmental Permits. The existing four permits are as follows:

- EPR/QP3535YD – Exothermic process (EXO)
- EPR/BK6866IW – Arc Furnace process (AFS)
- EPR/LP3504MJ - Optical Surface Technologies (OST)
- EPR/GP3639ZY/V002 – Electric Melting Department process (EMD)

The purpose of this variation is to vary the AFS permit and subsequently align the remaining permits by consolidating the AFS, EXO and OST permits (operated by AMG Superalloys Ltd) and request a multi-operator permit to include the AL permit (operated by AMG Aluminium UK Ltd).

Once consolidated, AMG are also proposing to extend the AMG Superalloys permit boundary. This will create a more functional permitted area and will allow AMG to operate under a more coherent permit structure.

Further to this, this variation will also include some additional DAAs relating to the installation of a new de-starch plant and also an additional Hazemag. An administration correction relating to the AFS Schedule 1 Activity will also be amended in the newly consolidated permit.

The proposed changes have been assessed against the requirements for Best Available Techniques (BAT) detailed in the relevant standards and technical guidance documents, including in particular the BAT Reference Document (BREF) for Non-ferrous Metals. The assessment demonstrates that the proposed changes meet the relevant standards for BAT, and where emissions are unknown (de-starching process) further testing has been scheduled to ascertain the implications.

The environmental risks associated with the proposed changes have been identified and assessed in accordance with the EA online guidance, Risk assessments for your environmental permit and an Environmental Risk Assessment (ERA) is included as Appendix A of this report.

An update and consolidation to the Site Condition Report(s) has also been completed to include baseline data when available for site areas which were not previously included in the permitted areas. The updated SCR can be found in Appendix B.

This report provides the written description and justification for the proposed changes, for which AMG seeks agreement from the EA. As required by the EA, the report includes: a written description of the changes, an environmental risk assessment and consideration of other relevant assessments and drawings.