

2. Water Discharge

Our current Permit (EPR/MP3936UJ) identifies the following ‘Source’ in Table S3.1 of ‘*Schedule 3 – Emissions and Monitoring*’:

‘Process wastewater consisting of cooling water from standard size ingot casting track.’

There is a Note to this entry which reads:

‘Note 1: Discharge shall cease upon completion of commissioning of the new rotary casting equipment (added to the permit via variation EPR/MP3936UJV007 in November 2017).’

This Note reflected the expectation associated with the forthcoming installation of the new automated ingot casting and stacking plant when the variation was approved in November 2017.

Because ‘teething troubles’ are all but inevitable on a new production line of the level of complexity of the one Brock has installed, it was always a key requirement of the project plan’s design that it should be possible to revert to using the old casting track if necessary to maintain production and customer service. The layout of the new plant and the sequence of steps to effect changeover from the old plant to the new plant (such as furnace relocation and rotation), were therefore carefully designed to offer this flexibility and resilience.

During the installation and commissioning period of the last 6 months, we have found it extremely valuable to be able to revert to using the old casting track when ‘teething troubles’ have been encountered on the new one.

This has proved so useful that, even now that the ‘teething troubles’ associated with introduction of a new plant are largely behind us, we wish to retain this flexibility for longer than originally envisaged. We are therefore highlighting this requirement as a change from the intention expressed in Note 1 of the current Permit.

On the old casting track a small amount of mains water is sprayed on the back of its moulds to assist cooling and solidification of the cast ingots. Unlike the new casting equipment which has a closed loop cooling system, this water is sent to drain and leaves site after passing through an oil interceptor.

When the old casting track is in operation the volume of water used in this cooling is small and has been measured at 380 litres/hour.

It should be emphasised that production will only revert to the old casting track if the new plant experiences issues which will stop it being used for a period long enough to impact Brock Metal’s customer service and delivery performance. It will be used in emergency situations only and as such its use is expected to be negligible.