



**ENVIRONMENTAL PERMIT
EPR/JP3538LX**

**RESPONSE TO REGULATION 60(1) – NOTICE DATED
16/12/2016, REQUIRING INFORMATION IN
RELATION TO REVISED BAT REFERENCE DOCUMENT**

IMPALLOY LIMITED

MARCH 2017


*Nicola
Clarke*

The logo for Nicola Clarke, featuring a stylized orange and yellow maple leaf above the name "Nicola Clarke" written in a green, cursive script font.

Client: **Impalloy Limited**
Willenhall Lane
Bloxwich
Walsall
WS3 8QT
Neil Moseley – 01922 714405
Neil.moseley@impalloy.com

Consultant Details: **Nicola Clarke**
Rose Cottage
50 Walsall Wood Road
Aldridge
WALSALL
WS9 8QT
T: 01922 451212
M: 07733 425129
E: nicola@nclarke.com
W: www.environmental-consultancy.com

Title: Impalloy EP BREF Review Mar 2017

Document Reference: IMP/EP/BREF Mar17

EPR Number: EA/EPR/JP3538LX/V003

Status: Final for issue

Date of Issue: 28th March 2017

Signed:



.....
Nicola Clarke - Environmental Consultant

Environmental Permitting (England and Wales) Regulations 2010 (as amended)

Regulation 60(1)

For each BAT Conclusion, where relevant and its individual sub-elements contained within the BAT conclusions document named above; please:

1. **Confirm whether or not you currently comply with the requirements of the BAT Conclusion, including any BAT associated emission levels, providing a description of the techniques in place and how they meet the standard.**
See attached spreadsheet.

2. **If you do not comply with the BAT conclusion describe how and by when you intend to meet the standard, before the 30th June 2020, being the date which, hereafter in this Notice, is referred to as the 'compliance date'.**
See attached spreadsheet

3. **Confirm:**
 - a) **If you intend to cease operating any activity which would be in breach of the relevant new BAT Conclusion after the compliance date, the date by which you intend to cease operation;**
See attached spreadsheet
 - or,
 - b) **if you intend to continue operating in a manner which would fail to comply with the relevant new BAT Conclusion, after the compliance date, what your justification for being allowed to do so is, and by what date you intend to come into full compliance, or a description of alternative measures to be adopted that will provide equivalent environmental protection.**
See attached spreadsheet

4. **Where there is a BAT Associated Emission Level (BATAEL) specified in the BAT conclusion, with which you will not comply by the compliance date, you should consider requesting a derogation. To do this you must provide sufficient technical and commercial information to demonstrate that achieving that BATAEL would lead to costs that are disproportionately high, compared to the environmental benefits; due to one or more of:**
 - i. **the geographical location of your installation;**
 - ii. **the local environmental conditions around your installation;**
 - iii. **the technical characteristics of your installation.****No other justification for a derogation can be considered.**
See attached spreadsheet.

5. For all discharges to surface water and/or sewer from the site, you must provide emissions data for the following hazardous pollutants: silver, arsenic, cadmium, cobalt, chromium (total), chromium (VI), copper, mercury, nickel, lead, zinc and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in our M18 guidance on 'Monitoring of discharges to water and sewer'

There are no discharges to surface water from the installation – all drainage on site discharges to a combined sewer.

There are no discharges to sewer from the installation. Water is occasionally used to 'quench' moulds to assist the cooling process but this is evaporated as steam.

6. With reference to our guidance Surface water pollution risk assessment for your environmental permit carry out the following assessments:

- Phase 1 Part A screening tests for the following hazardous pollutants: silver, arsenic, cadmium, cobalt, chromium (total), chromium (VI), copper, mercury, nickel, lead, zinc and any other relevant substances.
- Phase 1 Part B screening tests for the following priority hazardous substances: cadmium, mercury and any other relevant priority hazardous substances.
- For any substance which is not screened out by the Phase 1 Part A or Part B screening tests the Environment Agency will carry out Phase 2 modelling, unless your discharge is into a canal, a lake, an estuary or coastal waters, in which case you will need to undertake the modelling.

You must provide us with the results from the emissions monitoring, the results from the screening tests and the results from any Phase 2 modelling. You can use our H1 electronic screening tool to present the emissions data and to carry out the Phase 1 screening tests. We will provide a copy of the tool to your local representative at the site address.

With regard to the Phase 1 Part A screening a full list of hazardous pollutants is provided in our guidance Surface water pollution risk assessment for your environmental permit. You should review the list and carry out the screening for any hazardous pollutants, in addition to those specified in the notice, that you think may be present in your discharge.

With regard to the Phase 1 Part B screening for priority hazardous substances, our guidance Surface water pollution risk assessment for your environmental permit provides a full list of relevant priority hazardous substances and their associated annual significant loads.

Not applicable – see above – there are no water discharges from the installation.

7. Where your activity involves the use, production or release of a relevant hazardous substance (as defined in Article 3(18) of the Industrial Emissions Directive) carry out a risk assessment considering the possibility of soil and groundwater contamination at the installation with such substances.

Where any risk of such contamination is established either;

- Prepare and submit a baseline report containing information necessary to determine the current state of soil and groundwater contamination

OR

- Provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of soil and groundwater contamination so as to enable a quantified comparison to be made with the state of soil and groundwater contamination upon definitive cessation of activity.

Where you have concluded that there are no risks of soil or groundwater contamination, provide a copy of the risk assessment.

There are no hazardous substances used, produced or released on site.