Automotive Systems

Permit Reference: BX3376IG
Continental Teves (UK) Ltd,
Waun y Pound Industrial Estate,
Ebbw Vale,
Blaenau Gwent,
NP23 6PL.

Rebecca Green
Natural Resources Wales,
Rivers House,
St. Mellons Business Park,
St. Mellons,
CF3 0EY,

cc Liz Parr

24th March 2022

Dear Rebecca,

Re: Permit BX3376IG Continental Teves annual review for permit condition 4.1.4: Fugitive Emissions

The following letter is a response to the PPC permit condition 4.1.4 requiring annual review of fugitive emissions.

4.1.4: The Operator shall review fugitive emissions, having regard to the application of Best Available Techniques, on an annual basis, or such other period as shall be agreed in writing by the Agency, and a summary report on this review shall be sent to the Agency detailing such releases and the measures taken to reduce them within 3 months of the end of such period.

The potential for fugitive emissions to air, groundwater, surface water and sewer are addressed. This review has been compiled with regard to the sector guidance document (1) S2.07.

Emissions to air

A comprehensive review of fugitive emissions to air was undertaken by Enviros Consulting in December 2005. The review included an assessment of Best Available Techniques (BAT) and abatement equipment in use at the plant. The review concluded that BAT was met in relation to fugitive emissions to air and that fugitive emissions are likely to be negligible. No significant changes have been made to the plant since this assessment was undertaken.

No complaints have been received either written or anecdotal regarding fugitive emissions to air and no material changes to the guidance have been made. On this basis, it is concluded that the control of fugitive emissions to air is adequate.

The new hydrochloric acid tank and fume scrubber continue to work efficently

Emissions to surface water, sewer and groundwater

During the period 1st January 2021 to 31st December 2021 there were no accidental spillages or releases from the installation which were likely to have had an impact on groundwater.

Subsurface structures

In January 2022, due to the monitoring of site water usage, it was discovered that there was a significant underground water leakage commencing in December 2021. This leak was found in the pipework between the main factory inlet to the fire water storage tank (note this tank also supplies water to the plating plant). Specifically, this refers to the area around the water storage tank at the south west corner of the site; the water main runs from the north west corner of site to the affected area

The ground in the area concerned was excavated to repair the pipework. During excavation it was found that the leak had also caused some of the underground drainage channels; these were repaired at the same time and the ground (roadway) was re-laid

Surfacing

The external road surfaces on site and within the PPC area are generally on good condition although some “pot holes” became apparent and were repaired as necessary.

The roadway at the south eastern corner of the building was replaced for two reasons

a. To improve the fall of the drainage into the interceptor channels in the vicinity of the effluent treatment plant
b. The area around the machining swarf skips (for cast iron and aluminium) was remade to prevent surface water draining into the bund area around these slips

Bunding

The current bunding is deemed to be in good condition due the remedial works undertaken in recent years (as previously reported). Inspection of the bund walls in effluent has indicated that there are some areas where the grouting between the tiles needs to be replaced. These areas are on the top of the bund walls and as such do not pose a risk of fugitive emission. Repairs have been completed. See also the comment in (b) above – rainwater/surface water was able to enter the collection sumps for the bund for the soluble oil drainage from the swarf and was causing additional, unnecessary contaminated waste. This has now been addressed

Storage areas

The chemical storage facilities have been brought inside of the building adjacent to the existing plating plant. This eliminates the risk of contamination of surface water drains. The areas has twenty-four hour CCTV monitoring.

The area that the chemical stores previously occupied will is now the new location for several waste storage skips that were stored in various areas around the site. These include waste cardboard, scrap metals and waste wood. None of the skips will be used for hazardous materials that are a risk to the surface water drains. This area has 24h CCTV monitoring

Plating Plant Production

Plating volumes were variable throughout 2021 with higher volumes in the period January to September and dropping off during October and November. December was particularly difficult, and the factory closed for an additional week over the Christmas-New Year period.

Approximately 1.5 million parts were plated with around 20% of these being for external compaines

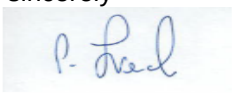
CCTV

The CCTV system was replaced in 2019 giving greater site coverage and improved image resolution. From a fugitive emission perspective, it allows the security guard monitoring the system to monitor the site more closely and identify issues earlier. Additional cameras were added in 2021

Summary

This review has identified that current measures to minimise fugitive emissions are considered adequate and given that, no further improvements are considered necessary.

Yours sincerely



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