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

29th March 2021

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.
Additionally, 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 Hydrochloric acid tank and fume scrubber were replaced in January 2021 and due to damage caused by an external supplier, were once again replaced in March 2021

Emissions to surface water, sewer and groundwater

During the period 1st January 2020to 31st December 2020 there were no accidental spillages or releases from the installation which were likely to have had an impact on groundwater.

Subsurface structures

A drain survey was completed in November 2018 which identified some areas of concern. These areas were repaired in 2019. The images and the repair work report are available on request

Surfacing

Previously an assessment was made of surfacing, both in the PPC application and previous fugitive emissions surveys. This concluded that the surfacing within the installation is generally in good condition and adequate for the purpose of minimising the risk of emissions to groundwater through spillages and leaks.

In general, the road surface on site is in a reasonable condition that does not present any risk to groundwater in the event of a spillage.
Following an inspection of the front road of the site in Q4/2018, several surface water drains were identified as needing repair within the next twelve months. The surface water drains were repaired in 2019 but due to budgetary constraints after a downturn in the automotive industry, complete resurfacing of the road was delayed

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

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

During 2020, the output of plated parts was in the region of circa 0.5 million, this figure includes approximately 20% of total output gained from sub-plating opportunities from other commercial automotive brake manufacturers. The reduction in volumes being due to the general downturn of the automotive industry and the normal end of product runs which unfortunately were not replaced by new products due to project delays or termination. The volumes increased towards the end of 2020 due to transfers from the closure of other Continental sites

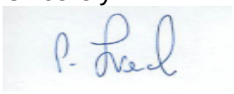
CCTV

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.

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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