

Compliance Assessment Report CAR_NRW0041021

Permit being assessed: BV7443IP.

For: Abercynon Inorganics EPR/BV7443IP, held by AB Connectors Ltd

At: Abercynon Inorganics Ynysboeth Trading Estate , Mountain Ash, Rhondda Cynon Taf, CF45 4SF.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Dale Padfield.

Report sent to: Ian Tollan, Plating Shop Manager on 15/02/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

AB Connectors

EPR/BV7443IP

The purpose of the compliance assessment report (CAR) is to review the biannual report of emission to sewer, annual report of emissions to air, annual solvent consumption, annual waste disposal and recovery and the annual water and energy usage for the installation over the 2022 period. And the review the annual data trends of these parameters when compared to previous years.

Emissions to sewer

The emissions to sewer reports for the periods July to September and October to December 2022 were reviewed. All results were within the specified emission limit values (ELVs).

Emissions to air

The annual report on the emissions to air showed all parameters on all emissions points to be within the specified ELVs. Solvent consumption was reported as 0kg.

Water usage and effluent discharge

Water usage continued a decreasing trend for 2022 which is also reflected in the decreased effluent discharge. There does appear to be an increase in specific usage (m^3/kg) when compared to 2021 and 2020 figures, but overall usage is down 944 m^3 on the previous year.

Waste disposal and recovery

A significant decrease in hazardous waste generation was seen in 2022 when compared to 2021, however the figures look consistent with previous years. There was an increase in non-hazardous waste generation in 2022, AB Connectors reported that this was due to a site clean up took place in February and March.

Energy Usage

The installation used a total of 6234.32 MWh of primary energy during 2022, 5435.256 MWh of electricity and 799.064 MWh of natural gas. Total primary energy usage produced 2680.8 tonnes of CO_2 . This is lowest reported total energy use at the installation for the past six years.

Environmental Performance Indicators - Review of annual trends

Trends in annual performance are calculated using the total weight of cadmium processed to determine the

usage of various parameter per kg of cadmium processed. Primary energy usage showed an increase of 19.2879 MWh per kg of cadmium processed when compared to 2021 figures, and an increase of 26.9493 MWh on the annual average between 2017 and 2021. Water usage showed an increase of 4.09 m³ per kg of cadmium processed when compared to 2021 figures but showed a decrease of 3.7516 m³ on the annual average between 2017 and 2021. Effluent discharge showed an increase of 1.0 m³ per kg of cadmium processed when compared to 2021 figures but showed a decrease of 2.227 m³ on the annual average between 2017 and 2021. Hazardous waste showed a decrease of 226.8kg per kg of cadmium processed when compared to 2021 figures and a decrease of 128.33kg on the annual average between 2017 and 2021. Non-hazardous waste showed an increase 635.9kg per kg of cadmium processed when compared to 2021 figures and an increase of 932.53kg on the annual average between 2017 and 2021. The significant increase in non-hazardous waste generated per kg of cadmium processed is likely a result of the waste generated by the site clean-up.

Overall, environmental performance trends appear to indicate a decrease in efficiency for 2022 and 2021. AB Connectors stated that activities in the plating department primarily involve zinc plating and not cadmium. This is the likely cause of the perceived decrease in efficiency when reviewing the data trends. As such, for future annual reporting, AB connectors may want to consider reporting the values against the sum of cadmium and zinc processed, as this may better reflect the activities conducted on site and provide more reliable trends in data.

Objectives and targets for 2022

NRW have received the ISO 14001 Objectives and Targets for 2021 as required from permit condition 4.1.5. AB Connectors have made several improvements with regards to energy efficiency, including a number of projects replacing lighting with LED fittings. Some projects have been put on hold, such as replacing single glazed windows with double glazing due to a reduction in the capex budget. Several projects have been completed or are close to completion, with the aim of reducing the use of single use plastics.

All reports are accepted.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.