

Compliance Assessment Report CAR_NRW0041425

Permit being assessed: DP3430LX.

For: ZF Automotive UK LTD- Pontypool Site EPR/DP3430LX, held by ZF Automotive UK Ltd
At: ZF Automotive UK LTD- Pontypool Site, New Inn, Pontypool, Torfaen, NP4 0TL.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 10/02/2023 between 10:00 and 14:00.

Parts of permit assessed: Site Inspection

NRW Lead Officer: Rebecca Green, accompanied by Luke Burton.

Report sent to: Shane Thomas, HS&E Manager on 07/03/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
B4 - Infrastructure - Containment of stored materials	Action only (X)	
E5 - Emissions - Waste	Assessed (A)	
E2 - Emissions - Land and groundwater	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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?

Criteria	Action needed	Complete by
A1	Submit surrender for drumbrake plant	28/04/2023
B1	Repair bund around plating plant	31/03/2023
B4	Replace rotten wooden pallet and IBC containing 5% sulphuric acid in effluent treatment plant.	28/04/2023

Action criteria codes are listed in the 'Important information' section below.

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

The purpose of this visit was primarily to discuss surrender of the part of the permit covering the drumbrake site and decommissioning of the zinc plating line.

Agenda

1. Introductions and business update
 2. Permit variation
 - a. Surrender, drumbrake site;
 - b. Update of activities in Table 1.1.1 – zinc plant.
 3. De-commissioning of zinc plating plant
 - a. Schedule and method;
 - b. Waste disposal.
 4. Site inspection
 - Zinc plating plant;
 - Zinc-nickel plating plant;
 - Anodising plant;
 - Effluent treatment plant, to include filter press discussion.
 5. AOB
- Meeting close

Attending -

ST, HS&E Manager, ZF;

Luke Burton, Senior Officer, Industry Regulation, SE, Natural Resources Wales (NRW);

Rebecca Green (RVG), Senior Officer, Industry Regulation, SE, (site officer), NRW.

1. Introductions and Business Update

ST gave a brief business update and reviewed ZF's business aims for the coming year.

2. Permit Variation

2a. Drumbrake plant

ZF sold the drumbrake site last year. All the associated equipment and treatment solutions have been removed and disposed of. ZF no longer carry out any EPR regulated activities there and are not in control of the site.

Action: ZF should apply to partially surrender this part of their permit. The surrender application should be completed in line with the guidance note for surrender [RGN 9](#). As a minimum the application must include a site condition report for the site, detailing any incidents or accidents that may have occurred while the plant was operating and also details of any monitoring that took place after the building was vacated. This should be submitted as soon as possible, **preferably by 28th April 2023.**

2b. Table 1.1.1 Activities

ZF will no longer be carrying out zinc (Zn) plating and enquired if this activity would need to be removed from the table of activities in the permit. After discussions with permitting, RVG advised that ZF do not need to remove the Zn plating activity from the activities listed in Table 1.1.1, unless they wish to do so. Removal of this activity would have very little effect on their OPRA score and thus the subsistence fee.

3. Decommissioning of Zinc Plating Plant**3a. Schedule and method**

The Zn plating plant is being decommissioned. A formal schedule was not available. The plating solutions and plant remain in-situ and will be disposed of in due course.

3b. Waste disposal

The cleaning solutions and water rinses have been disposed of and ZF hope to sell the plating solutions. The disposal method for the tanks has yet to be finalised, but may involve cutting them up. NRW will review the waste disposal documentation once disposal is complete.

4. Site Inspection**Zn plant**

Only the plating solutions remain in situ. Some of the tanks are in poor condition, showing de-lamination where the rubber lining has broken down or been damaged. The plant might be difficult to remove from its present location. The regeneration plant will also be removed and disposed of.

Zn-Ni plant

This line was working. ZF are setting up auto-dosing for the process tanks. This will ensure a more consistent solution composition and remove the need for so much manual handling. The surrounding area was generally clean and tidy.

Part of the bund had been damaged, probably by a dropped anode, and while the bund has not been breached, the area should be repaired as soon as possible (see Action B1 above).

Action B1: Send photographs of the bund repair to NRW by 31st March 2023.

Anodising plant

This line was not working, but components were ready to be processed. The surrounding area was clean and tidy.

Effluent Treatment Plant (ETP)

There is some redundancy in the ETP now that ZF have ceased Zn plating.

The filter presses do not have the capacity to cope with the present throughput. The sludge that cannot be run through the filter presses has to be tankered off-site, resulting in increased waste disposal costs. The cloths become blocked easily and have to be cleaned and dried before they can be re-used. ZF are trialling different filter cloths and these have been better. It is unlikely that capital will be available this year for replacement filter presses due to ZF's payback criteria for capital expenditures. RVG suggested investigating the suitability of second-hand equipment.

The frame of an IBC containing 5% sulphuric acid was showing signs of corrosion and the wooden pallet underneath was rotten. Both should be replaced and a plastic bunded pallet used instead of a wooden one.

Action B4: Send photographs of new IBC and bunded pallet to NRW by 28th April 2023.

5. AOB

None was raised.

END.

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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.