

Natural Resources Wales permitting decisions

**ZF Automotive UK Limited (ZF
Automotive UK Limited -
Pontypool Site) Decision
Document**

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Part surrender of a bespoke Permit

We have decided to accept the surrender of part of the permit for ZF Automotive UK Limited – Pontypool Site operated by ZF Automotive UK Limited.

The part surrender application number is **EPR/DP3430LX/S005**.

The Permit number is **EPR/DP3430LX**.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This decision document:

- explains how the operator's application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit as a result of the partial surrender

1. Outline of the application

The operator has applied to surrender the part of the permit relating to the drum brake anodising process. See section 4 and 5 for more information on what aspects this will change on the permit.

2. Receipt of the application

In order for us to be able to consider the application duly made, we needed more information. We requested clarification on the activity being surrendered.

Upon receipt of this information, on 06/06/2023, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

No claim for commercial or industrial confidentiality has been made nor have we identified information provided as part of the application that we consider to be confidential.

3. Consultation

As this application is for a part surrender, no consultation is required. This is in accordance with our Public Participation Statement¹.

4. The facility

4.1. Changes to the regulated facility

The permitted regulated activities have changed as a result of the partial surrender.

The drum brake anodising process is currently covered on the permit under a Section 2.3 Part A(1)(a) activity. This activity will stay listed on the permit following the partial surrender as it also includes the Caliper anodising process which is to remain.

¹ [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

The operator has confirmed that the capacity of the activity will change as a result of the partial surrender and so Table 1.1.1 is updated, reducing the capacities as detailed under the “descriptions of the specified activity” as follows:

	Existing	Following partial surrender
Zinc plating and anodising capacity	95m ³	77m ³
Zinc-nickel plating capacity	168m ³	No change
Aggregated volume of treatment tanks	262m ³	245m ³

As a result of the partial surrender, the permit has been varied to remove emission point ‘A7’ (Anodise – sulphuric acid tank) from Table 2.2.1 Emission points to air.

5. The Site

5.1 Changes to the extent of the site

The extent of the facility has changed as a result of the partial surrender.

The operator has provided a plan showing the extent of the facility that is to be surrendered. Following the partial surrender, the land comprising the warehouse where the drum brake anodising process took place is to be removed from the permitted site area.

A plan has also been provided showing the new reduced extent of the facility following the partial surrender. We consider this plan to be satisfactory and have used it to vary the existing plan on the permit (in Schedule 7) as part of this partial surrender.

5.2. Site Condition Report

The operator has provided a Site Condition Report detailing the condition of the land being surrendered and measures to avoid pollution risk.

We consider this description is satisfactory.

5.3. Pollution risk

The operator has provided detail on measures taken during the decommissioning of the drum brake anodising process. These include (but are not limited to):

- All liquid process chemicals being removed by authorised waste contractors where required or sent to the on site effluent treatment plant (ETP)
- The chilling unit associated with the process was emptied of glycol and stored in IBCs before being removed by an authorised waste carrier
- All wash down was carried out within the bunded area and waste water sent to the ETP for treatment
- The concrete plinth was removed and replaced following removal of the plant

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.

5.4. Satisfactory state

We have had regard to the state of the site before the facility was put into operation. The drum brake anodising process was installed in 1989, prior to the site coming into permitting regulations and as such no baseline site condition report/data is available. However, the operator has confirmed that the process was installed in the middle of a purpose built bunded area which was sealed with a chemical resistant epoxy coating. Furthermore, it was carried out on top of an additional high density concrete factory flooring. The operator has provided detailed procedures taken during the lifetime of the process to avoid pollution which we consider satisfactory. Furthermore, no major incidents have been reported during the lifespan of the process.

We are satisfied that the necessary measures have been taken to return the part of the site of the regulated facility being surrendered to a satisfactory state.

6. OPRA

Following this partial surrender, the OPRA score will remain unchanged (41).

7. Administrative changes

As part of this variation, the registered address of the Operator has been updated from Stratford Road, Solihull, West Midlands, United Kingdom B90 4GW to The Hub Central Boulevard, Shirley, Solihull, West Midlands, United Kingdom, B90 8BG.