

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

20th March 2023

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 Enviro 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.

Maintenance of Local Exhaust Ventilation and testing is carried out in accordance with all the relevant legislation.

Emissions to surface water, sewer and groundwater

During the period 1st January 2022 to 31st December 2022 there were no accidental spillages or releases from the installation which were likely to have had an impact on groundwater.

However, in January 2022, there was a fracture in one of the pipes delivering mains water to the premises. This resulted in approximately 1,200 m³ of clean water lost into the ground

Subsurface structures

Following the leak described above, it was also discovered that many of the surface water drains in the area were also damaged. These were also repaired at the same time. This work was concluded in February 2022

Surfacing

Several areas of the roads around site were in poor condition (potholes) and a major resurfacing of the site was carried out during the summer of 2022. In addition to resurfacing, any damaged surface water drain was repaired and the channels for external bunding were cleaned and repaired where necessary

Bunding

The current bunding in the effluent treatment plant 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.

Repairs have been made to external storage bunds (for kerosene and waste soluble oil coolant), specifically in areas where the fill pipes enter the bund to prevent fugitive emissions should there be a failure/overflow of the storage tank.

Storage areas

The area that the chemical stores previously occupied 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 2022, the output of plated parts was in the region of circa 1.2 million, this figure includes approximately 20% of total output gained from sub-plating opportunities from other commercial automotive brake manufacturers.

The production volume was lower than expected due to sanctions on Russia following the invasion of Ukraine (loss of a customer), the general economic situation and the continued problems in the automotive industry in obtaining electronic components.

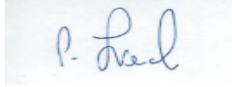
CCTV

Further additions have been made to the CCTV system on site to improve site security and provide clearer imaging.

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

A handwritten signature in blue ink, appearing to read 'P. French', on a light blue rectangular background.

P. French

Head of Plating and Environmental Management