

Compliance Assessment Report CAR_NRW0043251

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: Report/Data Review,

Reason: Routine.

On: 26/01/2024.

Parts of permit assessed: 2.2.2.8 Emissions to Sewer 2023; 4.1.3 Annual Reports 2023; EMS Review 2023.

NRW Lead Officer: Rebecca Green.

Report sent to: Shane Thomas, HS&E Manager, on 02/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Management - Energy Efficiency	Assessed (A)	
IR1D - Management - Efficient use of raw materials	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	
IR1E - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	

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

Total 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

Forms S1, Emissions to Sewer, 1st July to 31st December 2023 and 1st January to 31st December 2023; R1, Waste Disposal and Recovery 2023; E1, Energy Usage 2023 and WU1, Water Usage 2023, were received on 26th January 2024. The EMS Review 2023 was received on 1st February 2024.

All the reports are accepted.

S1, Emissions to Sewer 2023

1st July to 31st December: All parameters were within their respective emission limit values.

1st January to 31st December: All parameters were within their respective emission limit values.

Production 2023

Overall production volumes increased by 16% in 2023. Production of plated parts increased by 15% and production of anodised parts increased by 31%. No parts were zinc plated because the plant has been decommissioned and will be removed.

E1, Energy Usage 2023

Total energy usage and associated CO₂ emissions were higher than in 2022, both increasing by about 7% per million parts (pmp).

No gas used was used in 2023 because the zinc plating plant, which used gas fired driers, was not in operation. ZF do not intend to re-start the plant. All the solutions have been removed and the plant will be disposed of.

WU1, Water Usage 2023

Total water usage was less than in 2022, reducing by more than 20% pmp. Use per part has been reducing since 2017.

R1, Waste Disposal and Recovery 2023

The total amount of waste generated decreased compared with 2022, falling by more than 35% pmp. This is largely due to a 45% pmp reduction in the amount of liquid waste sent for disposal. The filter press has been operating more efficiently, reducing the need to tanker sludge waste off-site. The total amount of liquid waste sent for disposal decreased by 36% in 2023, resulting in a decrease of 547 tonnes of waste disposed of.

EMS Review 2023

Various energy efficiency projects have been completed.

An external noise survey has been completed and ZF are proposing to train an employee to carry out these surveys. Groundwater monitoring has been completed but ZF have not received the results yet.

The number of tanker loads required to remove sludge from effluent treatment has reduced significantly because the operation of the existing filter press has been optimised.

ZF plan to install dosing from IBCs for the zinc-nickel (Zn-Ni) process which will reduce waste from the number of smaller containers used presently.

Temperature control on the Zn-Ni plant has been improved and it has been converted to run on electricity, saving 400,000m³ of gas.

A briquetter has been ordered for the treatment of waste aluminium swarf.

ZF have investigated alternative methods for heating the factory and are awaiting Welsh government funding.

This has been another difficult year for all manufacturing industry. ZF have increased production volumes, despite stopping production of zinc plated parts and have achieved almost all of their 2023 EMS targets.

Disposal of sludge from the effluent treatment plant has been a problem in past years, but ZF have optimised operation of the filter press, resulting in a significant decrease in the amount of sludge that has had to be removed. ZF are still considering purchasing a new filter press.

The reductions in water use and waste generation are very encouraging.

NRW hope that ZF will continue to be able to reduce their use of resources and maintain the lower amounts of waste generated.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.