

Compliance Assessment Report CAR_NRW0043972

Permit being assessed: BX3376IG.

For: Waun-y-Pound EPR/BX3376IG, **held by:** CONTINENTAL TEVES UK LTD

At: Waun-y-Pound Industrial Estate , Ebbw Vale, Blaenau Gwent, NP23 6PL.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 08/04/2024.

Parts of permit assessed: 2.4.1.2 Waste Minimisation and Water Use Efficiency Audits;
2.2.2.8 Emissions to Sewer.

NRW Lead Officer: Rebecca Green.

Report sent to: Philip French, Head of Health & Safety and Environment, on 10/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR1D - Installations - Management - Efficient use of raw materials	Assessed (A)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	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

The Waste Minimisation Audit and Water Use Efficiency Audit reports for 2024 were received on 29th March 2024. Form S1, Emissions to Sewer, 1st January to 31st March 2024, was received on 2nd April 2024.

All the reports are accepted.

S1 Emissions to Sewer, 1st January to 31st March 2024

All parameters were within their respective emission limit values.

Waste Minimisation Audit, Quadrennial Review 2024

This review considers raw material use and waste generation.

Continental have corporate targets to reduce total waste generated and waste per 1000 parts by 2% per annum and 95% must be recycled.

Between 2021 and 2023 total waste generated decreased by 50% and waste/1000 parts by 30%. The projected decrease in production volumes will mean that waste/1000 parts will have to be carefully managed in the future.

Various measures are in place to reduce waste generation, including using re-usable filters, washing anode bags, process optimisation and where possible, internal processing of waste solutions. 25L drums have been replaced by IBCs and 5Kg bottles replaced with returnable 25Kg drums. The plant boiler and extraction system only operate when required.

Continental's corporate laboratories are investigating the substitution of cobalt and boric acid in the process chemistry.

Future work to reduce waste minimisation will include -

- Keeping the reject rate low, generating less heavy metals and treated sludge;

- Reducing heavy metals in process chemistry, thus reducing sludge volumes and

- Investigating methods for reducing the water content in treated sludge. It may be possible to use waste heat for this purpose.

Water Use Efficiency Audit, Quadrennial Review 2024

Continental have a corporate target to reduce water use per 1000 parts by 2% per annum and the site also measures water use in the plating plant. Use per 1000 parts for the whole site can be misleading because the manufacture of some parts does not require water.

Between 2021 and 2023 the total water usage reduced by 38% and use per 1000 parts fell by 18%.

The plating plant usage per 1000 parts increased due to reduced volumes being plated.

Water is supplied to the site via two meters. Meter 1 supplies water to a storage tank, feeding the

plating plant and the fire fighting water. Meter 2 supplies domestic water and that used for coolant make-up. Using recycled water is not feasible due to the sensitivity of the process chemistry and water from the roof is contaminated. Treated effluent and domestic waste are discharged to the foul sewer and waste machining coolant water is tankered away for disposal.

There are flow meters on inputs to the plating plant, spray rinses, deionised water system and coolant make-up. There is a flow meter on the discharge to sewer from the effluent treatment plant.

Future work to improve water use efficiency will include -

- Either installing conductivity meters on the rinse tanks or reducing the bore of the water feed pipes (the preferred option);

- Either returning the water used in the fire pump testing (~3000L/week) to the storage tank or collecting it and using it for coolant make-up;

- Concentrating more on domestic use, due to the likely changes in product mix and

- Collating the data from all the input and output flow meters, analysing it and taking action as necessary.

These reports demonstrate a comprehensive review of raw material use, waste generation and water use and show a real reduction in all aspects. There is an increase in water use in the plating plant due to the changes in product mix and Continental propose to address this. Natural Resources Wales would encourage them with their continued efforts to reduce resource consumption and waste generation.

The next reports are due in March 2028.

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.