

## Compliance Assessment Report CAR\_NRW0044480

**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:** Site Inspection,

**Reason:** Routine.

**On:** 03/06/2024 between 09:45 and 13:00.

**Parts of permit assessed:** Site inspection and update.

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

**Report sent to:** Shane Thomas, HS&E Manager, on 04/06/2024.

### 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)      |                  |
| IR1C - Installations - Management - Energy Efficiency   | Assessed (A)      |                  |
| IR2A - Installations - Operations - Permitted activities  | Assessed (A)      |                  |
| IR3A - Installations - Emissions and monitoring - Emissions to water, air or land                           | Assessed (A)      |                  |
| IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits | 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 purpose of this inspection was to update Natural Resources Wales (NRW) on zF's present activities and future developments prior to Rebecca Green's retirement.

zF have a good compliance record and, in NRW's opinion, the site's operations pose a small risk to the environment. Consequently, zF will not, at present, have a designated site officer. They have received an email detailing future arrangements and should continue to send all monitoring data to Liz Parr.

RVG notified zF that the BRef review for the Surface Treatment of Metals and Plastics sector has begun and advised them to contact their trade association as soon as possible so that they can have an input into the process. It may also be worthwhile for them to contact the Surface Engineering Association ([info@sea.org.uk](mailto:info@sea.org.uk)) who have wide influence in these matters.

Business is generally stable and may increase in the latter part of the year.

The zinc (Zn) plating plant has been removed and the floor will be made good before the area is used for storage. RVG advised against applying for a variation to remove the Zn process from the permit. It will not affect the subsistence fee as the anodising and zinc-nickel (Zn-Ni) processes are above the 30m<sup>3</sup> threshold.

The groundwater downstream of this area has been sampled and shows no major changes from previous monitoring rounds. At the moment, NRW do not consider that further monitoring is necessary, although this opinion may change in the future. The Site Closure Plan should be updated to reflect the removal of the Zn plant and the latest monitoring results.

The problem of increasing metal concentrations in the Zn-Ni electrolyte has largely been resolved by removing the anodes when the solution is not in use. zF plan to try using shorter anodes and may investigate the feasibility of replacing some soluble anodes with insoluble ones (perhaps empty anode baskets). The last disposal of electrolyte was in December 2023. Previously another two disposals would have been required by now, but these have not been necessary.

The plating line has been converted to electric heating, saving gas consumption and with little increase in electricity consumption.

The remediation of soil historically contaminated with solvents has been completed. zF were advised to update the SCR to show this and to add a phrase stating that the activities which caused the contamination have not re-started.

zF should not rely on their waste disposal contractor to determine the classification of their filtercake. A WAC analysis is not sufficient for this calculation and zF were advised to carry out a full analysis at least annually to confirm that the classification is correct.

Dosing systems for various processes are being improved.

On the Zn-Ni plant, carboys are being replaced with refillable IBC reservoirs which pump the required chemical to the relevant tank. Stirrers have been installed in the bulk Zn-Ni tanks, so that smaller daily additions can be made. This will maintain a more stable chemistry in the electrolyte and should produce a more consistent product.

Sulphuric acid will be delivered to one of the three anodising tanks via an air pump from a refillable IBC. Other carboys on this line will be replaced in a similar way.

### **Site Inspection**

The factory was clean and tidy and the external areas were also well organised.

Zn plant area - This is largely clear. The flooring will be scarified and a levelling screed applied on the top. It did not appear to be unduly contaminated. All drains and pipe runs will be filled in.

zF are reviewing the amount of external drainage as they appear to have some blind drains that are not needed.

Effluent treatment plant - The blue caustic (NaOH) tank needs repainting. Inputs are being reviewed to try to reduce the volume discharged to sewer. The Zn-Ni effluent treatment plant continues to be effective and zF receive support from the installer.

Swarf yard oil tanks - the containment is in very good condition, given its age, but the rainwater should be emptied and the walls and steel tank in the bund would benefit from painting when the weather allows.

Remediation area - most of the boreholes have been filled and capped. A few have been left capped but accessible for use in future monitoring rounds.

NRW appreciate the open and co-operative relationship that has been developed with zF and hope that this will continue into the future.

**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](mailto: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](mailto: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.