

## Compliance Assessment Report CAR\_NRW0044498

**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:** Site Inspection,

**Reason:** Routine.

**On:** 05/06/2024 between 10:15 and 12:00.

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

**NRW Lead Officer:** Rebecca Green.

**Report sent to:** Philip French, Head of Plating & Environmental Management, on 05/06/2024.

### 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)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	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 Continental's present activities and future developments prior to Rebecca Green's retirement.

RVG explained future arrangements for regulation of the site. Continental have a good compliance record and, in NRW's opinion, the site's operations pose a small risk to the environment. Consequently, Continental 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 Continental 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.

The business was badly affected by the pandemic and the conflict in Ukraine. However, the site's strength is in its adaptability. New production lines are being installed and the site will continue producing niche spare parts. Other manufacturing is being brought back in-house.

#### **Site Inspection**

The site was clean and tidy both inside and outside.

The plating plant and ancillary equipment is in good condition, even though it is quite old and the associated containment is also in good condition.

Continental are working with their supplier on the replacement of cobalt in treatment solutions. The oil heating coils had to be replaced in one treatment tank after they failed due to corrosion caused by an additive in the solution. They have been replaced with PTFE electric heaters.

The bulk tanks in the effluent treatment plant have been relocated, making space for a larger scrubber, which should reduce some of the corrosion of the internal cladding. This is due to be repaired by internal lining. The containment here is in good condition.

The sand filter has a new touch screen control panel. It is cleaned about once a quarter to prevent the sand clumping in the bottom of the tank.

The treatment plant has a new touch screen control panel which can, for example, display chemical tank volumes and the pH of the solution in various stages of treatment. All the level sensors are ultrasonic which are better suited to the application. They are more accurate and react more quickly. Dosing of treatment chemicals is now proportional to the proximity of the solution being treated to the set point.

The filtercake is approximately 70% moisture. Drying the filtercake in the compressor room was quite successful and further trials may be conducted in the future.

NRW appreciate the open and co-operative relationship that has been developed with Continental 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.