

Compliance Assessment Report CAR_NRW0046410

Permit being assessed: BV7443IP.

For: Abercynon Inorganics EPR/BV7443IP, **held by:** AB Connectors Ltd

At: Abercynon Inorganics Ynysboeth Trading Estate , Mountain Ash, Rhondda Cynon Taf, CF45 4SF.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: 4.1.2 Emissions & 4.1.3 Performance.

NRW Lead Officer: Brigid Armstead.

Report sent to: Ian Tollan, Plating Shop Manager, on 21/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	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.

You are non-compliant with your permit.**We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.****4. Details of our assessment**

AB Connectors Annual Report 2024

The purpose of the compliance assessment report (CAR) is to review the following reports:

- Q3 and Q4 emissions to sewer (S1)
- Annual report of emissions to air (A1)
- Annual water usage (WU1)
- Annual waste disposal and recovery (R1)
- Annual energy usage (E1)
- Performance Indicators (PI1)
- EMS Annual improvement target report

Emissions to sewer

Form S1 for Q3 and Q4 were submitted to NRW on 29th January 2025.

The S1 reports for the periods July to September and October to December 2024 were reviewed. All emissions to sewer results were within the specified emission limit values (ELVs).

The Redox potential in T1 was recorded at 141mV. Condition 2.2.8.1 of the permit requires this parameter to be maintained at >150mV. Form S1 has a Redox limit of 300mV, so an email was sent to the operator requesting further information on this parameter. The following response was received:

"I have always worked to the Parameters as set out on Form S1. Namely that the Redox Potential in tank T1 had to be less than 300mV and the Redox Potential in tank T2 had to be greater than 300mV.

The mV setting in tank T1 ensures Chrome reduction from Chrome 6 to Chrome 3 to allow precipitation of Chrome in the settlement process.

The mV setting in tank T2 ensures the oxidation of Cyanide. Ensuring the breakdown of toxic cyanide and the break up of any metal/cyanide compounds, to allow precipitation.

I set the mV level to ensure chrome reduction takes place based on the parameters/conditions in tank T1. If I set the mV reading in tank T1 too high to meet the 150 mV then there is the potential that untreated hexavalent Chrome will pass through the system. Hexavalent Chrome does not precipitate out at higher PH and will be discharged to the sewer. The Emission limit value on Chrome (V1) is extremely tight at 0.1mg/l.

I appear to be caught between two conflicting parameters, and a discrepancy in the wording /requirements of the permit. (Form S1 and Table 2.2.11)

I have never had an issue regarding this parameter in the 20 plus years I have operated under the various permits.

It would be a simple task to set the mV bottom limit of 150, but this might cause greater issues in what actually is discharged to the environment. Namely Hexavalent Chrome."

As the S1 Emission limit for Chromium VI was not breached and there is ambiguity in the Redox potential limit, this matter will need to be further investigated.

Action: Please provide a risk assessment regarding non compliance of the >150mV limit for Redox potential in T1.

Emissions to air

The annual report on the emissions to air showed all parameters on emissions points A1, A2 and A3 to be within the specified ELVs. Emission Point A4 was within the ELVs set for Particulate matter and pH but exceeded the ELV for Oxides of nitrogen (as NO₂) with a result of 2.4 against an ELV of 1.5mg/m³

Solvent consumption was reported as 0kg.

Action: Uncertainty values were not provided for any of the tests. Please resubmit form A1 with uncertainty values by 28 February 2025.

Emissions to air A4, Oxides of Nitrogen (asNO₂)- The original Emission limit values were based on historical measurements of Nitric Acid mist so the emission levels are not accurate for NO_x. This ELV will be reviewed during Sector Permit Reviews. (CAR_NRW0034643)

Water usage and effluent discharge

Form WU1 was submitted to NRW on 29th January 2025.

Water usage continued a decreasing trend for 2024. This was reflected in the decreased effluent discharge.

Waste disposal and recovery

Form R1 was submitted to NRW on 29th January 2025

An increase was seen in hazardous waste generation when compared to 2023.

There has been a decrease in non hazardous waste disposal compared to previous years.

Energy Usage

Form E1 was submitted to NRW on 29th January 2025

The installation used a total of 4925.3058 MWh of primary energy during 2024, 3900.1488 MWh of electricity and 1025.157 MWh of natural gas. The overall energy usage is similar to the previous year.

Environmental Performance Indicators - Review of annual trends

Form PI1 was submitted to NRW on 29th January 2025

Trends in annual performance are calculated using the total weight of cadmium processed to determine the usage of various parameter per kg of cadmium processed.

The 2024 PI1 submissions shows improvements in performance compared to cadmium processed for primary energy, water use, effluent discharge, hazardous waste and non hazardous waste.

Primary energy usage showed a decrease of 16.165 MWh per kg of cadmium processed when compared to 2023 figures. This shows a steady improvement over the last two years. This years figure is still higher than those from 2018 to 2021, indicating that further energy efficiency action is required.

The figures for primary energy usage are generated from all onsite activities, so these figures may not be representative if there has been an increase in activities other than cadmium plating.

Objectives and targets for 2024

NRW have received the ISO 14001 Objectives and Targets review for 2024 as required by permit condition 4.1.5.

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.