

## Compliance Assessment Report CAR\_NRW0046452

**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:** 31/12/2024.

**Parts of permit assessed:** 4.2 Reporting.

**NRW Lead Officer:** Luke Burton.

**Report sent to:** HS&E Manager, ZF Automotive UK Ltd, on 26/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4B - Installations - Information - Reporting	C4 No impact	4.1.5
IR4B - Installations - Information - Reporting	C4 No impact	2.4.1.2
IR4B - Installations - Information - Reporting	C4 No impact	2.8.1

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

Total non-compliances recorded	Total non-compliance score
3	0.3

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?

Criteria	Action needed	Complete by
IR4B	No action	Already completed
IR4B	No action.	Already completed
IR4B	No action	Already completed

Compliance criteria codes are listed in the 'Important information' section below.

### 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

This Compliance Assessment Report (CAR) has been produced in response to the submission of annual performance and monitoring report(s) required by the following environmental permit conditions.

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#### Monitoring data

Condition 4.1.2 of the environmental permit states the following:

The Operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:-

4.1.2.1 in respect of the parameters and emission points specified in Table S2 to Schedule 2;

4.1.2.2 for the reporting periods specified in Table S2 to Schedule 2 and using the forms specified in Table S3 to Schedule 3;

4.1.2.3 giving the information from such results and assessments as may be required by the forms specified in those Tables; and

4.1.2.4 to the Agency within 28 days of the end of the reporting period.

Table S2 is partially reproduced below:

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
Zinc, mg/l	S1	6 monthly	01/07/2006
Nickel, mg/l	S1	6 monthly	01/07/2006
Chromium, mg/l	S1	6 monthly	01/07/2006
Copper, mg/l	S1	6 monthly	01/07/2006
pH	S1	6 monthly	01/07/2006
COD	S1	6 monthly	01/07/2006
Suspended Solids	S1	6 monthly	01/07/2006
Water usage	NA	Every 12 months	01/07/2006
Energy usage	NA	Every 12 months	01/07/2006
Waste disposal and/or recovery	NA	Every 12 months	01/07/2006

Table S3 is partially reproduced below:

**Table S3: Reporting Forms**

Media / parameter	Form Number	Date of Form
Sewer	S1	08/05/06
Energy	E1	08/05/06
Waste Return	R1	08/05/06
Water usage	WU1	08/05/06

Report(s) for condition 4.2.1 were submitted via email on 30/07/2024 and 31/01/2025.

The report(s) submission was made inside the reporting window which represents compliance the environmental permit.

The report(s) submitted are for the parameters and emission points specified in Table S2 to Schedule 2.

The report(s) submitted are for the reporting periods specified in Schedule 2 Table S2 which represents compliance with the environmental permit.

The report(s) have been submitted using the forms specified in Table S3 to Schedule 3 which represents compliance with the environmental permit.

The report(s) submitted include the information from such results and assessments as may be required by the forms specified in Table S3 to Schedule 3 which represents compliance with the environmental permit.

The monitoring results for 2024 demonstrate that the limits for the emissions to sewer for the parameter(s) and emission point(s) set out in Table 2.2.8 have not been exceeded which represents compliance with the environmental permit.

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### **Performance of the permitted installation**

Condition 4.1.3 of the environmental permit states:

The Operator shall submit to the Agency a report on the performance of the Permitted Installation over the previous year, by 31 January each year, providing the information listed in Tables S4.1 and S4.2 of Schedule 4, assessed at any frequency specified therein, and using the form specified in Table S3 to Schedule 3.

Table S4.1 and Table S4.2 are not present as '*No performance data is required to be reported*'.

Table S3 is partially reproduced above.

Report(s) for condition 4.1.3 were submitted via email on 31/01/2025.

The report(s) submission was made inside the reporting window which represents compliance the environmental permit.

The report(s) submitted are for the performance of the Permitted Installation over the previous year which represents compliance the environmental permit.

The report(s) have been submitted using the forms specified in Table S3 to Schedule 3 which represents compliance with the environmental permit.

Reports for environmental permit condition 4.1.3 are deemed to satisfy and represent compliance with environmental permit condition 2.7.2.

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### **Environmental Management System improvement targets**

Condition 4.1.5 of the environmental permit states:

Where the Operator has a formal environmental management system applying to the Permitted Installation which encompasses annual improvement targets the Operator shall, not later than 31 January in each year, provide a summary report of the previous year's progress against such targets.

Report(s) for condition 4.1.5 were submitted via email on 19/02/25.

The report(s) submission was not made inside the reporting window which does not represent compliance the environmental permit.

The report(s) submitted include a summary report of the previous year's progress against Environmental Management System improvement targets which represents compliance the environmental permit.

Condition 4.1.5 of the environmental permit has been breached as the report was submitted late.

This breach has been scored a C4 non-compliance category – A non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property.

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### **Review of and progress against waste and water audits**

Environmental permit condition 2.4.1.2 states:

[The operator shall] carry out periodic waste minimisation audits and water use efficiency audits. If such an audit has not been carried out in the 2 years prior to the issue of this Permit, then the first such audit shall take place within 2 years of its issue. The methodology used and an action plan for increasing the efficiency of the use of raw materials or water shall be submitted to the Agency within 2 months of completion of each such audit and a review of the audit and a description of progress made against the action plan shall be submitted to the Agency at least every 4 years thereafter

Report(s) for condition 2.4.1.2 were submitted via email on 19/02/25.

The last report for condition 2.4.1.2 was submitted in December 2020

The report(s) submission was not made inside the reporting window (December 2024) which does not represent compliance the environmental permit.

The report(s) submitted include a review of the waste minimisation audits and water use efficiency audits and a description of progress made against the action plan which represents compliance the environmental permit.

Condition 2.4.1.2 of the environmental permit has been breached as the report was submitted late.

This breach has been scored a C4 non-compliance category – A non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property.

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### **Review of accident management plan**

Condition 2.8.1 of the environmental permit states:

The Operator shall maintain and implement when necessary the accident management plan submitted or described in Section 2.8 of the Application. The plan shall be reviewed at least every 2 years or as soon as practicable after an accident, whichever is the earlier, and the Agency notified of the results of the review within 2 months of its completion.

Notification for condition 2.8.1 was submitted via email on 19/02/25.

The last notification for condition 2.8.1 was received in July 2020.

The notification submission was not made inside the notification window (July 2024) which does not represent compliance the environmental permit.

The notification includes the results of the review which represents compliance the

environmental permit.

Condition 2.8.1 of the environmental permit has been breached as the report was submitted late.

This breach has been scored a C4 non-compliance category – A non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property.

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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.