

## Compliance Assessment Report CAR\_NRW0049777

**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:** Check Monitoring/Sampling,

**Reason:** Routine.

**On:** 24/10/2025.

**Parts of permit assessed:** Reporting, Emissions Monitoring and Notifications.

**NRW Lead Officer:** David Thomson.

**Report sent to:** Redacted, Head of Plating, Environmental Management and Training, on 24/10/2025.

### 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)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	2.2.2.8

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(1)	Operator to investigate the reason for the elevated nickel levels and for the discrepancy with DCWW analysis results.	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.

**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**

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment of Continental Teves UK Ltd's (hereafter operator) Q2 (April to June) 2025 compliance with the relevant environmental permit conditions for Reporting, Emissions & Monitoring and Notifications.

**1.0 Reporting**

The purpose of this section is to record environmental permit condition breaches arising from the incorrect or late reporting of emission monitoring data. Condition 4.1.2 of the environmental permit states:

*The operator shall, unless otherwise agreed in writing, submit reports of the monitoring and assessments 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 window*

**Table S2 to Schedule 2** (Reporting of monitoring data) to the environmental permit was updated in a notice of variation on 28/03/13 and is partially reproduced below.

<b>Table S2 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission point</b>	<b>Reporting period</b>	<b>Period begins</b>
Chromium and its compounds (mg/l)	S1	Every 3 months	01/01/05
Zinc and its compounds (mg/l)	S1	Every 3 months	01/01/05
Nickel and its compounds (mg/l)	S1	Every 3 months	01/04/13
Flow	S1	Every 3 months	01/04/13

**Table S3 to Schedule 3** to the environmental permit is partially reproduced below.

<b>Table S3 Reporting forms</b>		
<b>Media / parameter</b>	<b>Form Number</b>	<b>Date of form</b>
Sewer	S1	01/01/2005

**1.1 Reporting Compliance Assessment*****Point Source Emissions to Sewer – S1***

1. The reporting form for emissions to sewer was submitted via email on 07/07/2025.
2. The reporting form submission was made inside the 28-day reporting window which represents compliance with the environmental permit.
3. The reporting form submitted includes all parameters and emission points specified in Table S2 to Schedule 2 which represents compliance with the environmental permit.

4. The reporting form submitted is for the reporting period specified in Table 2 to Schedule 2 which represents compliance with the environmental permit.
5. The emissions data was submitted using the form specified in Table 3 to Schedule 3 which represents compliance with the environmental permit.
6. The reporting form submitted includes results and assessments as specified in Table S2 to Schedule 2 which represents compliance with the environmental permit.

## 2.0 Emissions and Monitoring

The purpose of this section is to record environmental permit condition breaches arising from the exceedance of permitted emission limits. Condition 2.2.2.8 of the environmental permit states:

*The limits for the emissions to sewer for the parameters and emission point set out in Table 2.2.8 shall not be exceeded.*

Table 2.2.8 (Emission limits and monitoring frequency to sewer) to the environmental permit was updated in a notice of variation on 28/03/13 and is partially reproduced below.

Table 2.2.8 Emission Limits and monitoring frequency to sewer				
Emission point ref. & location	Parameter	Limit (including unit)	Monitoring frequency <sup>1,2</sup>	Monitoring standard or method
<b>S1</b>	pH	Min 6, Max 11 (as a weekly average)	Continuous	BS 6068-2.50: 1995
	Chromium and its compounds	1.0 mg/l	Monthly	BS ISO 17294-2:2003, BS6068-2.89:2003
	Zinc and its compounds	2.0 mg/l	Monthly	BS ISO 17294-2:2003, BS6068-2.89:2003
	Nickel and its compounds	2.0 mg/l	Monthly	BS ISO 17294-2:2003, BS6068-2.89:2003
	Flow	100 m <sup>3</sup> /24hrs & < 20m <sup>3</sup> /hr	Monthly	Ultrasonic flow meter at outfall

## 2.1 Compliance Assessment

### Point Source Emissions to Sewer – S1

#### Limit Exceedance – Nickel

Sewer emissions from the effluent treatment plant at the Continental Teves site in Ebbw Vale are further monitored and treated by Dwr Cymru Welsh Water (DCWW) before discharge. On 17 April 2025, DCWW reported a nickel value of 3.2 mg/l to Continental Teves which is an exceedance of the permitted emission limit and represents non-compliance with the environmental permit. It is worth noting that the corresponding effluent analysis results undertaken by Continental Teves indicated nickel levels of only 1.56 mg/l and 1.60 mg/l.

Since this permitted limit exceedance, the operator has undertaken an investigation and discovered that the elevated nickel level was caused by the disposal of an out of date chemical into the concentrated waste acid storage tank in the effluent plant. Further details of this incident are provided in the Schedule 5 Part B submission.

In addition, the operator also submitted effluent samples for third-party analysis with their results being more in line with the elevated nickel levels measured by DCWW. With support from their instrument supplier, the operator found an issue with the accuracy of their analysis equipment. Consequently, the operator has now implemented weekly controls for detecting and correcting equipment drift.

**Compliance Classification Scheme (CCS):** *As a result of this non-compliance with permit condition 2.2.2.8, a CCS score [C3] has been recorded against compliance sub-criteria IR3A – Emissions to Water, Air and Land.*

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.