4.1.4 - Fugitive emissions

IPPC Permit Number: DP3430LX

Operator: ZF Automotive UK Ltd

Installation: ZF Automotive UK Ltd, Pontypool

Fugitive emissions to surface water, sewer and groundwater

1. With regard to subsurface structure.

- There were no fugitive emissions to groundwater during 2024.
- ZF Pontypool has an existing layout showing the location of all drains and subsurface pipework. The layout is updated when required by the Facilities department.
- 3 subsurface interceptors are installed between the land drains and the outfall to the Afon Llywd. These are inspected and cleaned on an annual basis; checks are also performed for water quality against our discharge permit.
- Generally, all pipework is above ground; leaks are easily spotted, repaired as soon as is practical and the leak controlled until the repair can be carried out.
- The main sewer system from the effluent building to the site boundary was checked during the August shutdown 2006. GD Environmental Services carried out a CCTV survey no issues were identified with the sewer apart from minor damage to the pipework from the effluent to the Chemical storage area. This section of pipe work has never been used and forms part of the original installation allowing for future expansion which never occurred.
- Ground water monitoring was carried out in August 2007, local to the zinc plating process, to establish baseline characteristics. No evidence of fugitive emissions from the process was found.

2. Surfacing.

- There were no fugitive emissions to surface water during 2024.
- The site has been constructed on a concrete base which varies between 200 & 300mm thick. The majority of internal areas are epoxy coated. All machine sumps are also epoxy coated to prevent leaching into the soil, these are also cleaned regularly.
- The Senior Management team and shop floor representatives conduct regular weekly audits with regard to shop floor condition and local housekeeping. Process plant floors and bunded areas are inspected against a separate audit plan.
- All roadside surface water drains have spill mats positioned adjacent to them; all staff are aware of site spillage procedure.
- All above ground storage tanks are held within bunded areas; these are inspected regularly and are in good condition. Bulk storage bunds have also a secondary impervious layer applied.
- All bulk storage tanks are fitted with high level warning indication.

3. Sewer

- The outflow from the effluent process direct into the sewer is monitored by Welsh water and reports are received on a monthly basis.
- There were no fugitive emissions to the sewer during 2024.

4. Air Emissions

- There were no fugitive emissions to air during 2024.
- Due to the reduction in parts requiring zinc plating, the site took the decision to stop production through the Zinc plating processes at the end of 2022 and transfer all the work to the zinc nickel process. Therefore, there were no emissions from the zinc plating process during 2023. The plant was decommissioned and removed from site during 2024.
- Production demands have decreased on the zinc nickel process from around 3.5 million components being plated during 2023 to around 2.2 million during 2024 with the reduction of BMW volumes.
- The site conducted stack air monitoring in regard to fugitive emissions of hydrogen fluoride and Hydrogen Chloride from the Zinc Nickel process in May 2024 which found low level of emissions being released from the operation of the process. The air monitoring will be repeated in 2027.
- A new anodising process was installed in 2016. Production demands have decreased from around 2.2 million components being anodised during 2023 to around 1.7 million during 2024 with the reduction of PSA and intercompany production volumes.
- The site conducted stack air monitoring in regard to fugitive emissions of sulphuric acid from the Anodise process in May 2024, which found low level of emissions being released from the operation of the process. The air monitoring will be repeated in 2024.
- Internal air quality monitoring was conducted in July 2024 and showed no fugitive emissions from either the zinc nickel process or the anodise process. The air monitoring will be repeated in 2027.

HS&E Manager

13/03/25