

Compliance Assessment Report CAR_NRW0050017

Permit being assessed: BK6483IU.

For: Deeside Engine Casting Plant, **held by:** Toyota Motor Manufacturing (UK) Ltd

At: Toyota Motor Manufacturing (UK) Ltd, Zone 3, Deeside Industrial Park, Deeside, Flintshire, CH5 2TW.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 26/11/2025.

Parts of permit assessed: See below.

NRW Lead Officer: Rick Prichard.

Report sent to: Principal Engineer, Principal Engineer, on 02/12/2025.

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	C3 Minor	3.1.2
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
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(2)	See main text.	27/11/2025

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 relates to the monitoring and reporting requirements in Permit EPR-BK6483IU in that a Schedule 5 Part A Notification was received on 03/11/25, in relation to fugitive dust emissions, with a dust result of 7.7 mg/m³ against the emission limit of 5mg/m³, as follows:

Schedule 5 Notification - ST12 Low Pressure Casting Sand Knockout Process for ST12

Under Permit condition 4.3.1(b), I need to inform NRW of an emission limit value breach on our Deeside Low Pressure Casting Sand Knockout process emission point ST12.

On 1st November Friday afternoon we received our annual air emission compliance monitoring reports from our MCERTS supplier. Upon checking the results for ST12, the total particulate matter result was 7.7 mg/m³ +/-0.39 mg/m³. The Permit emission limit value is 5 mg/m³ Dust. As there is no combustion or melt process connected with ST12, the particulate matter will likely be spent casting sand (ceramic beads). The result was derived from stack monitoring conducted on the 29th September between 12:40 – 16:00 hours. Upon receiving this result the Sand Knockout process was stopped and the filter abatement process checked during the weekend shutdown. Upon inspection a small hole was found in the filter allowing dust to bypass the abatement. The filter was replaced, and with the process returned to standard condition, restarted today with full abatement. TMUK will arrange for further monitoring to confirm the result is compliant.

Assuming the breach occurred on the 29th September, the best-case mass emission can be calculated as follows:

Scenario	No. of Shifts since 29 th Sept	No. of operational hours since 29 th Sept	Result	Vol Flowrate @ STP	Total Mass dust emitted to atmosphere
Total emission	50	390	7.7 mg/m ³	380 m ³ /hr	1.14 kg
Total emission over permit limit	50	390	2.7 mg/m ³	380 m ³ /hr	0.40 kg

TMUK will investigate preventative maintenance records to see if there are any indicators which allow us to calculate a worst-case mass emission as part of a full investigation. The follow-up Part B Notification will follow in due course. If you have any questions in the meantime, please do not hesitate to contact me.

A Category 3 score has been applied against permit condition 3.1.2. "The limits given in Schedule 3 shall not be exceeded". As per Table S3.1 ST12 (Point source emissions to air).

Reporting

Although the operator notified Natural Resources Wales about the breach by email on the 03rd November 2025, following the receipt of the analysis data, Permit condition 4.3.1(b) states that "in the event of a breach of any permit condition the operator must immediately—

(i) inform Natural Resources Wales, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time"

Further information is provided in permit condition 4.3.2 which states that "Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule."

Schedule 5 requires that in the event of a permit breach, that a Part A notification is sent within 24 hours.

Given that the operator received the monitoring data from the MCERTS supplier late on Friday afternoon (31st Oct, not 01st Nov as stated in their email above), they did report the breach on the next available working day (03rd Nov). While outside the 24 hour reporting period stated in their permit, I am content they reported the breach as soon as practicably possible.

The operator has satisfied this permit condition.

The operators Schedule 5 Part B notification will be submitted around mid-February once their investigation is complete and will include a full countermeasure plan.

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.