

Compliance Assessment Report CAR_NRW0037721

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 carried out: Report/Data Review, Reason: Routine.

On 03/03/2021.

Parts of permit assessed: Energy/water/waste and sewer discharge

NRW Lead Officer: Geraint Harris.

Report sent to: Iain Tollan , Plating Shop Manager on 03/03/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	

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

Total number of 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.

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

AB Connectors

EPR/BV7443IP

Upon reviewing the annual reports submitted by AB Connectors several actions were generated.

The actions and their responses are detailed below.

Emission to Sewer (Form S1) -Q3,Q4 2020

The emissions to sewer for the months of July to September were provided on forms S1,Q3 and S1,Q4. The discharge parameters are all within the permitted ELV'S. However, the pH for the cyanide oxidation within the S1 returns for October to December (Q4) was below the stated limit of pH 10.5. This is the first time that the pH for Tank 2 has been reported lower than the limit set in table 2.2.11 in your permit. Is there a specific reason for the pH being below the permitted level? It doesn't look to have affected the free cyanide concentration in the final effluent.

Action: please provide an answer to the above?

AB Connectors Response:

In analysing the data for the quarter October to December to complete Form SI, I have written the reading recorded in the Effluent Plant Weekly Record (which was 10.70) in my rough calculations so that it looks like 10.20. I have then used this figure when filling in Form S1 for October to December in error.

The Redox reading at the time (controls the dosing of Sodium Hypochlorite which breaks down the Cyanide) was 437 mV which is well above minimum limit value of 300Mv.

Reporting of Energy Usage (Form E1) – 2020

Electrical and gas usage have increased in 2020 compared to 2019. It is unsure if this is a result of increased production. NRW are pleased to see that electrical supply to the site is now sourced from renewable energy.

Action: Site to confirm if the increase in energy usage is related to increase in production? If not, what is the reason for the increase?

AB Connectors Response:

Gas usage down slightly (7%). Electricity usage increased slightly (4%). Partly attributed to increased working hours (overtime/shift work) due to the measures brought in because of COVID. Cover for people shielding/self-isolating. Additional shifts to separate people working on production lines.

Reporting Waste Disposal and Recovery (Form R1) – 2020

Upon looking at the trend of figures relating to waste for the last 4 years. For the years 2019 to 2020, there was an increase in the amount of the following:

- Effluent sludge generated
- Oil/solvent contaminated wipes /paper
- Total Hazardous waste
- Metal waste
- Incinerated waste

The following decreased:

- Recovered Hazardous waste
- Recovered other non-Hazardous waste
- Total non-hazardous waste recovered.

Are the above figures related to an increase in production or a specific action undertaken at the site?

Action: Please explain the reason for the reduced performance regarding the waste figures?

AB Connectors Response:

Increase in effluent sludge disposal (18%). Additional ion exchange regenerant disposed of offsite (2000l). Quality issues with plated components required the additional make up of Chromate passivate solution over the period (4000l). This also resulted in an increase in the Total Hazardous Waste disposal reported.

Disposal of Oil/Solvent contaminated wipes/paper increased by approx. 9%. No specific reason for this increase other than normal fluctuation due to variation in production processes and other operational activities.

Metal waste for recycling increased by approx. 11%. There was a slight increase in Brass swarf (2 tonne) and General metal waste (5 tonne). No specific reason for the increase other than variation in production processes (Brass) and the one-off disposal of equipment and scrap items etc (General Metal).

Incinerated waste increased by approx. 45%. Unclear what has caused this rise other than disposal for 2019 seems low compared to both 2018 and 2020.

Recovered Hazardous waste dropped by approx. 82%, This category is mainly made up of 25l plastic drums and other one-off items for disposal.

Recovered Non-Hazardous Waste decreased by approx. 40%. No cardboard bales appear to have been collected in 2020 (12 tonnes 2019). This would have led to a reduction in the Total Non-Hazardous Waste recovered reported also.

Reporting of Water Usage (Form WU1) – 2020.

Water usage is continuing to be reduced year on year. However, in 2020 the amount of effluent discharge slightly increased. Is there a specific reason for the increase in effluent?

AB Connectors Response:

Discharge to effluent increased by approx. 4%. Variation in Production/ Operational activities such as overtime working.

Many thanks for responding to all the actions. The current pandemic is influencing a number of processes at the site making a direct comparison on the previous year's results difficult. All actions are now considered complete.

Fugitive report 2020 (received on the 23rd February 2021).

No fugitive emissions were reported for this period.

The report is accepted.

*****End of Report***

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.