

Compliance Assessment Report CAR_NRW0039019

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

On 03/12/2021.

Parts of permit assessed: 2.4.1.2 Waste Minimisation & Water Use Review; 2.8.1 AMP; 4.1.4 Fugitive Emissions Review.

NRW Lead Officer: Rebecca Green.

Report sent to: Philip French, Head of Plating & Environmental Management on 03/12/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
D2 - Incident Management - Accidents, emergency and incident planning	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
E5 - Emissions - Waste	Assessed (A)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	4.1.4

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

Total number of non-compliances recorded	Total non-compliance score
1	0.1

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
G4	Send reports to NRW by due date.	31/12/2021

Action 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

The Waste Minimisation and Water Use Efficiency Review 2021, the Accident Management Plan Review 2021 and the Fugitive Emissions Review 2021 were received on 3rd December 2021. All these reports were overdue but were received promptly after Natural Resources Wales (NRW) sent a reminder.

All the reports are accepted.

2.4.1.2 Waste Minimisation and Water Use Efficiency - Quadrennial Review, December 2021

This review was due in November 2020 but was not received until December 2021.

Continental Teves (CT) are set corporate targets to reduce water consumption by 3% pa, to reduce waste generation by 2% pa and to increase waste recycling rates to 95%.

Plating and machining have been identified as areas that use the most water. Water use in the plating operation has been optimised and further measures cannot be economically justified. Water use in machining operations has been audited and potential means of reducing consumption have been identified. An action plan is being implemented and CT estimate that this will save ~10m³ of water per year.

The machining process has been identified as producing the most waste. The scrap metal is recycled and the waste coolant is the subject of the water use efficiency project mentioned above.

CT also have corporate energy use reduction targets of 3% pa. Energy use peaked in 2020 due to the pandemic, but has since fallen. Various measures have been used to optimise energy usage, including maximising the throughput of the plating plant, shutting down equipment when not in use and repairing compressed air leaks.

2.8.1 Accident Management Plan - Biennial Review April 2021

This review was due in April 2021. It had previously been submitted in April 2020, when it was not due.

This is a comprehensive review of possible accidents or incidents, the likelihood of occurrence and measures in place to minimise the likelihood of the incident happening and to mitigate any environmental consequences.

It was proven to be effective after an incident in January 2021.

4.1.4 Fugitive Emissions - Annual Review 2020

This review was due in April 2021. It had been written but not sent.

There were no fugitive emissions to air, surface water, ground water or soil in 2020.

The hydrochloric acid storage tank and associated scrubber in the effluent treatment room were replaced in March 2021.

There has been some confusion at CT regarding submission dates for the periodic reports required by some permit conditions. This is partly due to difficulties in locating reports generated by the previous manager and also business pressures caused by the pandemic. For these reasons only one Cat4 non-compliance has been issued. NRW will not be so lenient regarding late submission of reports in the future, unless they are informed of any delays well before the due date.

Due dates for some reports have now been changed and are given below. All should be received by NRW on or before 1st April in the year specified and then at the frequency given in the permit. NRW hope that this will prevent future late submission of reports.

4.1.4 Fugitive Emissions, Annual Review - to be received by 1st April 2022**2.8.1 Accident Management Plan, Biennial Review - to be received by 1st April 2023****2.4.1.2 Waste Minimisation and Water Use Efficiency, Quadrennial Review - to be received by 1st April 2024**

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.

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.