

Compliance Assessment Report for:

STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

Permit number	PAN005141	Operator name	Newbridge Energy Ltd
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Site name	Newbridge Energy Ltd		
Site address	Brickfield Lane, Denbigh Road, Ruthin, Denbighshire, LL15 2TN		
Type of assessment	Review of information provided as part of the operator's response to R36 notice		

Date of assessment	30.03.22	Time in		Time out	
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Parts of permit assessed	Review of information provided as part of the operator's response to R36 notice		
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NRW Lead officer	Jamie Blythin	Accompanied by	
Report sent to – Name and position	Peter Mills	Date	29.04.22

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
A1 Specified by permit	A - Assessed, no evidence of non-compliance	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	
Choose an item.	Choose an item.	

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

Total number of non-compliances recorded
0

2. What action is required?

Criteria	Action needed	Complete by
	N/A	

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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

On 23.12.21, NRW sent Newbridge Energy Ltd confirmation that we were satisfied that the following steps of the R36 statutory notice (served 24.09.21) had been met :

1)Fuel for the CHP Biomass Boiler shall only be accepted on site and used in the CHP Biomass Boiler if it is listed in the environmental permit (Virgin woodchip and untreated waste wood listed in Schedule 2 Table S2.1), free of contaminants and conforms to the manufacturer's specifications (Uniconfort biomass boilers and CHP plants, Combustor standard,E,Manual for Installation, Maintenance, Storage, ED03/2017-nev.00).

Fuel for CHP boiler was checked during the site inspection 10.11.2 (CAR ref PAN005141 10.11.21).The fuel specification as detailed in the boiler manufacturer's operational manual has been incorporated within the Site Operating Procedures (SOP).

2)Remove all fuel for the CHP that is stored at the site that is not authorised by the environmental permit, contains contaminants, and does not conform to the manufacturer's specifications (Uniconfort biomass boilers and CHP plants, Combustor standard,E,Manual for Installation, Maintenance, Storage, ED03/2017-nev.00).

The removal should specifically include the fuel material stored in the first outside fuel bay on 20.09.21 which contained contaminants including plastic, rubber and electrical wires. Ensure this material is taken to a site authorised to accept it and completed duty of care documentation e.g. waste transfer notes are provided to NRW by the date specified.

The non-compliant waste identified during site inspection 20.09.21 was removed from site 11.10.21. The operator provided NRW with completed waste transfer notes and photographs.

3)Ensure the fuel mix for the CHP Biomass Boiler is stored undercover in line with SOP Fuel Blending (BFLSP-SW-010-001SOP006 April 2021 Issue 1).

The SOP for fuel blending has been updated to SOP Fuel Blending 006 Issue 2 (04.10.21). This issue was assessed during site inspection 10.11.21 (CAR ref- PAN005141 10.11.21).

4) Ensure staff follow the site EMS and relevant SOPs including Material Acceptance (BFLSP-SW-010-0013OP004 Issue date 24.03.21 Issue number 1) and Waste acceptance, pre-acceptance and rejection procedure (NBEP038, 19.04.21).

Assessed during site inspection 10.11.21 (CAR ref-PAN005141).

In this correspondence, we acknowledged that a response to all of the steps in the notice (1-5) was provided by Newbridge Energy Ltd to NRW by the specified date, however, we felt that the response to step 5 (a,b and c) did not adequately satisfy the requirements of the notice.

We requested the operator to provide a more detailed response to step 5 (a,b and c) to demonstrate that the following had been achieved:

a) During normal operating conditions exhaust gases from the combustion unit shall be abated via the installed fabric filter (bag house) to comply with the Emission Limit Value of 50mg/Nm³. (Your response should include, but not be limited to, an explanation of the linkages between the CHP unit and abatement. Confirm how abatement of gases is ensured and any circumstances where they are not. Provide evidence to support this response)

b) The fabric filter shall be maintained in good operating condition. (Your response should include, but not be limited to, the fabric filter maintenance regime- Planned Preventative Maintenance (PPM) schedule in accordance with manufacturers recommendations)

c) The performance of the fabric filter shall be monitored during plant operation using suitable process monitoring techniques (including but not limited to filter differential pressure) and reviewed at least hourly by a suitably competent process operator. Where process monitoring data indicates a deterioration in filter performance that may lead to, or is likely to be causing an emission limit value exceedance, then an investigation shall be carried out immediately by suitably competent personnel and remedial measures taken to prevent and where that is not possible, minimise an emission limit breach. (Your response should include, but not be limited to, more detail regarding how abatement is monitored, who carries out the monitoring, staff training, what parameters staff monitor, operating procedures, what actions staff take in the event of an alarm/ malfunction, incident investigation procedure)

The operator provided the required information specified above to NRW by the date requested (27.01.22) and we are satisfied with the information provided. NRW considers that the R36 notice has been fully complied with.

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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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.