

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 a R61 notice requesting information

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 a R61 notice requesting information
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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
C2 General management – Management system and operating procedures	C3 Minor	1.1.1
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
1

2. What action is required?

Criteria	Action needed	Complete by
C2	N/A- Actions already completed	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.

You are non-compliant with your permit. We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

On 14.09.21, NRW received a large number of incident reports (smoke, odour) relating to the operations at Newbridge Energy Ltd. As part of NRW's investigation into these incidents a R61 notice requesting information was served on Newbridge Energy Ltd 28.10.21. The operator responded to this and provided the requested information to NRW by the deadline 18.11.21. This information was reviewed and a further R61 notice to request additional information was served on Newbridge Energy Ltd 23.12.21.

This is a review of the information provided by the operator in response to the R61 notice request for additional information sent 23.12.21. The operator provided this information to NRW by the required deadline 27.01.22 and we are satisfied that the request for additional information has been met.

The operator has undertaken a detailed root cause analysis to determine why part of the abatement system (fabric bag filter) was not operational between 14.09.21-15.09.21.

The operator states that the root cause was due to excessive ash build up in the Combined Heat and Power (CHP) boiler chamber. In their response to the R61 notice, the operator outlines a series of events which they believe occurred as a result of the ash build up:

- 1) Build-up of ash compromised the operation of 2 of the 4 fixed soot blowers.
- 2) The loss of function of 2 of the soot blowers caused the boiler heat-exchanger to become compromised due to a build-up of process ash
- 3) At the time of the event, the operating software for the Supervisory Control And Data Acquisition (SCADA) system was pre-programmed to instigate an automatic bypass of the bag filter, should the heat-exchanger temperature fall below a pre-determined set-point (140 deg. C)

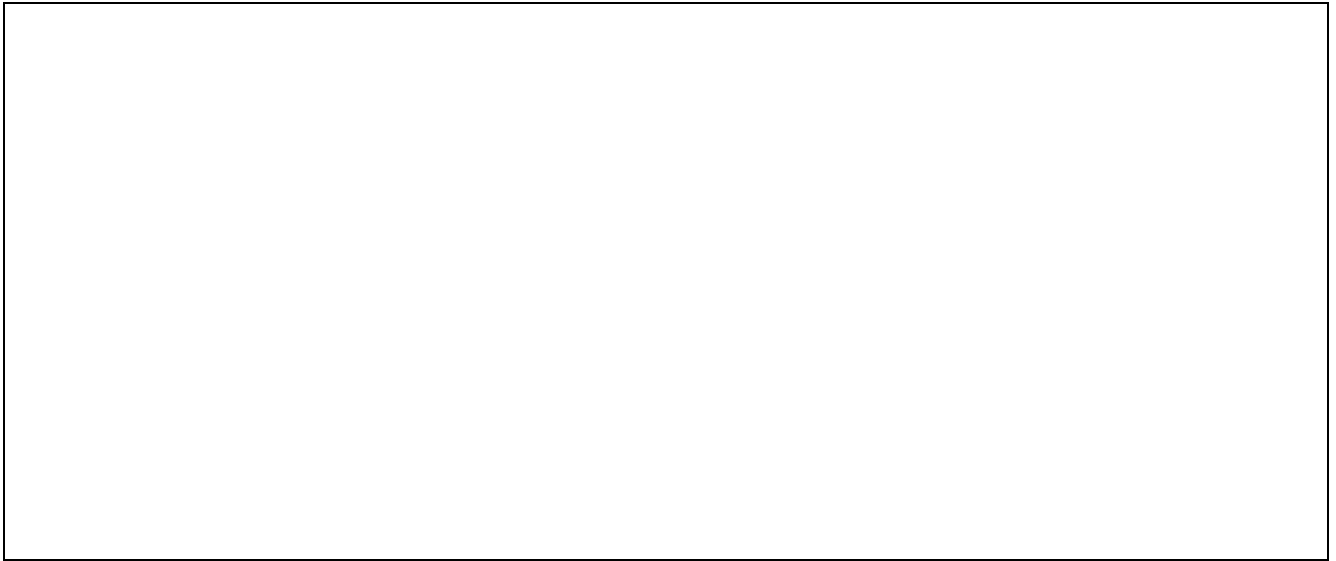
The operator states that the excessive build-up of ash within the boiler chamber occurred due to a delayed shut down. Ordinarily, this ash would have been cleared out during the shutdown.

NRW considers the failure to properly maintain the boiler chamber, which resulted in the ash build up and ultimately caused the bypass of the bag filter, to be a breach of permit condition 1.1.1 (C2- General Management -Management system and operating procedures -CCS3).

Following this event, the operator has implemented a number of measures to minimise the risk of this issue happening again:

- The timing of future shutdowns will be determined by reference to empirical data on boiler performance rather than a timetabled approach
- The temperature at which the bypass of the bag filter is triggered has been adjusted to 110 deg. C. This has been programmed into the operating software and set in the SCADA system by the CHP manufacturer.
- The damaged soot-blowers have been replaced with soot-blowers made out of higher grade steel to mitigate the rate of erosion
- Improved monitoring of alarms by the Shift Supervisor in conjunction with refresher training
- Updated Planned Preventative Maintenance (PPM) schedule
- A new Site Operating procedure (SOP), SOP13, has been produced which details the procedure for emergency shut down/ start up the CHP unit

NRW are satisfied with the measures that the operator has put in place and these will be subject to an audit at a future date.



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.