

Compliance Assessment Report CAR_NRW0040412

Permit being assessed: AB3191FR.

For: Parc Stormy Anaerobic Digestion Facility, held by Severn Trent Green Power (Bridgend) Limited

At: Stormy Down, Porthcawl, Bridgend, Mid Glamorgan, CF33 4RS.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 20/09/2022.

Parts of permit assessed: Improvement conditions

NRW Lead Officer: Mostyn Wall.

Report sent to: Maria Priestley , Permits and Accreditation Officer on 20/09/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Action only (X)	

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?

Criteria	Action needed	Complete by
E1	Action: STGP to undertake and review 4 rounds of bioaerosol monitoring in the next 12 months and submit a proposal to NRW regarding future bioaerosol monitoring	01/10/2023
G2	For the suggested process monitoring, provide the trigger levels for each of the parameters with associated procedures in place if trigger levels are exceeded.	01/11/2022

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

WT Bref Permit Improvement Conditions

Severn Trent Green Power submitted to NRW documents in response to the improvement conditions set out in permit EPR/AB3191FR/V005 issued on the 03/03/2021. Each improvement condition response is detailed below.

IC2 Operator shall submit to Natural Resources Wales for approval a site specific bioaerosol risk assessment (SSBRA) in accordance with 'M9: environmental monitoring of bioaerosols at regulated facilities.

Severn Trent Green Power (STGP) submitted a site specific bioaerosol risk assessment to NRW meeting the improvement conditions IC1 and IC2.

In the risk assessment and following experience from sister AD sites in England, STGP proposed 2 rounds of bioaerosol monitoring within 12 months.

NRW does not accept the proposal of two monitoring rounds within the next 12 months. NRW requires STGP to undertake quarterly monitoring as outlined in the permit.

NRW will assess the results of the quarterly bioaerosol monitoring rounds before deciding on any future monitoring requirements at the installation.

Action: STGP to undertake and review 4 rounds of bioaerosol monitoring in the next 12 months and submit a proposal to NRW regarding future bioaerosol monitoring.

IC3 BAT 1 - Implement and adhere to an environmental management system (EMS) that incorporates all the following features

- (VII) Follow development of cleaner technologies,

Severn Trent Green Power (STGP) has an internal process to review the adoption of cleaner technologies every 4 years. The next review will be in May 2026. The EMS document meets the improvement condition.

- (VIII) Whole life cycle considerations when designing a new plant,

STGP has submitted a site closure plan that meets the improvement condition.

- (IX) Application of sectoral benchmarking on a regular basis,

STGP has signed up to the Anaerobic Digestion and Bioresources Association (ADBA) to be part of the AD Plant Operators Benchmarking Survey. STGP must ensure to be proactive in future sector led benchmarking initiatives and to review its internal and external benchmarking. Severn Trent's internal benchmarking is extensive and will be a useful database to assess and improve AD performance across their business. The EMS document meets the improvement condition.

- (XII) Residues Management Plan.

STGP has submitted a residues management plan that meets the improvement condition.

IC4 BAT 3 In order to facilitate the reduction of emissions to water and air, BAT is to establish and

to maintain an inventory of waste water and waste gas streams, as part of the environmental management system

- information about the characteristics of the waste to be treated and the waste treatment processes;

STGP has a comprehensive process description that discusses the waste treated and processes involved.

- information about the characteristics of the waste water streams; and
- information about the characteristics of the waste gas streams

STGP has provided information and EMS documents detailing the waste gas and water streams at the facility. This is detailed in the APC 42 South Wales AD Process Control document, Process Description – Stormy Down – Appendix 1 and the odour management plan. This meets the improvement condition.

IC5 BAT 8 Monitoring Emissions to Air

STGP has submitted an EMS document outlining the monitoring of emissions to air, Water Scrubber and Biofilter. The document outlines the monitoring frequency, techniques and standards. This meets the improvement condition.

IC6 BAT12 Review of Odour Management Plan

STGP had submitted a detailed odour management plan that meets the improvement condition.

IC7 BAT 23 Energy efficiency

STGP have submitted a energy efficiency plan that meets the improvement condition.

IC8 BAT 38 Process parameters for the anaerobic treatment of waste.

STGP have submitted process parameters for the installation. The process monitoring in place meets the improvement condition.

Action: For the suggested process monitoring, provide the trigger levels for each of the parameters with associated procedures in place if trigger levels are exceeded.

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.