

Compliance Assessment Report

Report ID:
CAR_NRW0033961

This form will report compliance with your permit as determined by an NRW officer

Site	Bryn Pica AD Plant EPR/SP3537VQ		Permit Ref	SP3537VQ	
Operator/Permit holder	Biogen Bryn Pica Ltd				
Regime	Installations				
Date of assessment	20/09/2018	Time in	11:00	Out	13:00
Assessment type	Audit				
Parts of the permit assessed	1.1,2.1,3.1,4.1				
Lead officer's name	Taylor, Richard				
Accompanied by					
Recipient's name/position	Leigh Hawkins/ Site Manager	Date issued	25/09/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Bryn Pica Anaerobic Digestion Site – Permit EPR/SP3537VQ

Site Inspection 20th Sept 2018

Present – Ufuoma Llaya (Biogen Regional Compliance Officer), Stuart Gordon (Regional Operational Manager, Biogen), Richard Taylor (Natural Resources Wales - Site inspection Officer).

NO BREACHES OF PERMIT CONDITIONS WERE WITNESSED DURING THE INSPECTION.

The site visit was carried out on an ad hoc basis and served as a site introduction for the NRW Officer RT. An Introduction to the site as well as a mandatory health and Safety brief was carried out.

A site discussion was conducted. This went through the process. Site receives planned waste inputs only from Local Council kerbside collections. Corn starch bags are separated out and a homogenous mix is pumped through to the digester. Other potential contaminants are screened out in the reception hall and passed into the waste chain. Final digestate conforms to PAS110. Previously this was applied to land under an exemption for fertiliser use. The site has permit limits to the emissions to air of the Jenbacher CHP engine rated at 3.456 MWth aggregated thermal input and requires measurements to be taken on their auxiliary flare if this is operated for over 10% of the operating period. Rainwater is collected on site and used as greywater. Process water is recirculated within the digestate material. Sealed drainage is connected to the neighbouring landfill site surface runoff. This is tested for ammonia levels prior to release to ensure the quality remains within permit parameters.

Parts of the Permit assessed	Discussion
1.3.1(a) Efficient use of raw materials	Site recirculates leachate through the process and uses rainwater on site as grey water. Water efficiency is minimised throughout the site.
2.1.1 Scheduled activities, and 2.2.1 Where the activities take place.	The site carries out its operations in accordance with the written permit.
3.2.3 Containment of liquids	The site is designed so that all liquid holding tanks are built into an

	integral concrete bund. The digestate tank is in a separate but co-joined bund designed to carry the maximum 110% if a catastrophic failure were to occur.
3.3 Odour	Odour is detectable on the site. A faint whiff was experienced off site at the nearby car-park but this was judged as not to be at levels likely to cause offence. This is an area where the site is most liable to receive complaints from the public or neighbouring businesses.
3.4 Noise and vibration	Noise and vibration was not experienced at site in levels likely to cause pollution despite the site operating at the inspection and the unloading of waste was witnessed.
3.6 Pests	No pests, scavengers, vermin, seagulls or other birds were witnessed. No insects with the exception of a couple of flies were seen. These were witnessed in the sorting hall but contained due to the management of the doors which open to accept the waste truck and close behind it during the unload.

End.

EPR Compliance Assessment Report

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.