

Compliance Assessment Report for:

STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

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| 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 | Site inspection |

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|---------------------------|----------|----------------|-------|-----------------|-------|
| Date of assessment | 27/09/22 | Time in | 13:10 | Time out | 15:20 |
|---------------------------|----------|----------------|-------|-----------------|-------|

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|---------------------------------|---------------------------------|
| Parts of permit assessed | Site inspection & report review |
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| NRW Lead officer | Jamie Blythin | Accompanied by | N/A |
| Report sent to – Name and position | Richard Errington- Director | Date | 18/10/22 |

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 | |
| F1 Amenity – Odour | A - Assessed, no evidence of non-compliance | |
| G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales | X - Action only | 4.3.4 |
| F3 Amenity – Dust/fibres/particulates and litter | A - Assessed, no evidence of non-compliance | |
| C2 General management – Management system and operating procedures | A - Assessed, no evidence of non-compliance | |

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 |
|----------|---|-------------|
| G4 | ACTION 1-Action only- Formally notify NRW of the change in registered office address by the specified date. | 02/11/22 |

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

This Compliance Assessment Report (CAR) follows a routine site inspection at Newbridge Energy Ltd on 27/09/22.

The Managing Director, Environmental, Health and Safety Manager and the new Company Director accompanied NRW staff during the inspection.

The Combined Heat and Power (CHP) unit (NB1) was operational at the time of the inspection. The plume was barely visible and there were no odour or dust issues identified on site.

Fuel for NB1 consisted of wood chips and arboriculture residues. This fuel appeared free of visible contamination and compliant with the permit requirements.

Following issue of the permit variation (PAN-005141/V002) on 11/05/2022, the operator is currently finalising designs for the covered fuel storage area to comply with pre-operational measure 2 (PO2). Prior to commencement of construction, the operator is required to submit to Natural Resources Wales (NRW), for approval, a report detailing the specification and design of the covered fuel storage area. This requirement was discussed with the operator during the inspection.

NRW has reviewed the following document 'SOP015-Moisture sampling of CHP fuel- Issue 5-15/07/22.' This document addresses Action 1 in Compliance Assessment Report reference NEL CAR 10.05.22(sent 06/07/22) and this action is now considered complete.

NRW also considers Improvement Condition1 (IC1), in Table S1.3 of the permit, to be complete.

During the inspection, the operator took a sample of fuel from the walking floor of NB1 and tested it in the moisture analyser. This was carried out in line with SOP105- Moisture sampling of CHP fuel-Issue 5. The moisture results were within the limits specified in the CHP Operations and Maintenance Manual.

Moisture sample results are stored in a site database. A selection of recent sample results were inspected and these were within the limits specified in the CHP Operations and Maintenance Manual.

The registered office address for the operator has recently changed. The company name and registration number have remained the same. In line with permit condition 4.3.4, the operator is required to formally notify NRW of the change in registered office address. This was discussed with the operator during the inspection.

ACTION 1-Action only- Formally notify NRW of the change in registered office address by the specified date (02/11/22).

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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.