

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	Site inspection

Date of assessment	03/05/23	Time in	13:15	Time out	14:17
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Parts of permit assessed	Site inspection
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NRW Lead officer	Jamie Blythin	Accompanied by	
Report sent to – Name and position	Richard Errington, Comp Director	Date	28/06/23

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	
B4 Infrastructure – Containment of stored materials	C3 Minor	2.3.1 & 1.1.1
F1 Amenity – Odour	A - Assessed, no evidence of non-compliance	
E1 Emissions – Air	A - Assessed, no evidence of non-compliance	
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
2

2. What action is required?

Criteria	Action needed	Complete by
B4	Action 1- Repair the hole in the roof covering of the first fuel storage bay and provide NRW with photographic evidence that this has been completed.	28/07/23
	Action 2- Ensure all CHP fuel is stored undercover.	30/06/23
	Action 3- Amend Point 5 in SOP 006-fuel blending and application-version 7 (p2) to specify that all fuel must be stored undercover once unloaded into the bays. Provide a copy to this updated document to NRW.	28/07/23
	Action 4- Ensure skips containing ash wastes are covered in line with SOP 009-issue 2-04.10.21-Management of process derived wastes.	30/06/23

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. The Company Director and the Health Safety and Environmental Compliance Manager accompanied NRW staff during the visit.

Both Combined Heat and Power (CHP) units were operational at the time of the inspection. Emissions from both stacks were barely visible and there were no odours observed.

Improvement Condition 2 (IC2) requires the following

'The operator shall provide fuel storage that meets the requirements of 4.2.1 of Environmental Permitting Technical Note 5/1(18), Final Draft, dated 15/08/18 for all fuels that are used in combined heat and power boiler (activity reference AR1 in Table S1.1 of this permit). All fuel shall be stored under appropriately designed cover which shall ensure that it is kept dry and that ingress of rainwater is prevented. Storage shall be suitably sized to provide sufficient capacity, having regard also for other relevant factors such as the separation of different fuel types and sizes as required operationally.'

In response to IC2, the operator has constructed covered fuel storage bays in line with designs submitted to NRW on 25/11/22. Roof coverings have been placed over the concrete storage bays (formed of concrete blocks) and new concrete flooring has been put down. The length of the roof coverings stops just short of the length of the storage bays (approximately the length of one concrete block).

The majority of fuel was stored under the roof coverings but there was a small amount of fuel stored in the area at the front of the storage bays which does not benefit from the roof coverings. There was also a small hole in the roof covering of the first fuel storage bay.

Action 1- Repair the hole in the roof covering of the first fuel storage bay and provide NRW with photographic evidence that this has been completed.

NRW acknowledges the improvements that have been made in relation to IC2 and does not have an issue with the fundamental design of the covered fuel storage bays. NRW considers that IC2 has been met. However, the quantity of fuel stored in the bays at the time of the inspection was greater than could be stored undercover with the existing infrastructure. NRW considers this to be a breach of permit condition 2.3.1 (B4- Containment of stored materials-CCS3-Minor-consolidated with condition 1.1.1).

Action 2- Ensure all CHP fuel is stored undercover.

The permit requires that all fuel is kept undercover. To achieve this, the operator must either reduce the quantity of fuel stored in the bays or extend the roof coverings. This was discussed with the operator.

The operator confirmed that quantities of fuel stored within the bays would be reduced to ensure all fuel is stored underneath the roof coverings. This would be controlled through management of daily fuel deliveries.

Following the inspection, the operator submitted the following updated Site Operating Procedure (SOP) to NRW '006-fuel blending and application-version 7.'

This SOP includes an example of a fuel order table which shows loads are allocated daily and includes the following statement 'This is to ensure all CHP fuel is stored undercover.'

Point 5 (p2) states

'After unloading, all product must be moved into the bays to ensure control of exposure to moisture, as per site NRW permit requirements.'

Action 3- Amend Point 5 in SOP 006-fuel blending and application-version 7 (p2) to specify that all fuel must be stored undercover once unloaded into the bays. Provide a copy to this updated document to NRW.

Once the necessary amendments have been made (Action 3), NRW is likely to accept the updated SOP 006-fuel blending and application-version 7 which ensures fuel quantities are controlled through daily allocation and ultimately all CHP fuel will be stored undercover. However, should fuel quantities increase/ be stored outside the roof coverings in the future, the roof coverings will need to be extended.

The fuel stored within the bays was free of visible contamination and was dry to the touch. Extensive moisture monitoring is being carried out in line with the SOPs. Records of moisture monitoring/ sampling were reviewed and these were in accordance with the specifications stated in the CHP Operation and Maintenance Manual.

Bottom ash waste from the CHP process was stored outside in an uncovered skip. On previous inspections, adequate covering has been in place. The site has a management procedure to ensure skips containing ash wastes remain sheeted-SOP 009-issue 2-04.10.21-Management of process derived wastes states 'The bottom ash stream will be stored separately in sheeted RORO skips. The skips are sheeted while on site to mitigate any dust. They remain sheeted in transit to minimise dust.' NRW considers this to be a breach of permit condition 1.1.1 (B4-Containment of stored materials-CCS3-Minor-Consolidated with condition 2.3.1).

Action 4- Ensure skips containing ash wastes are covered in line with SOP 009-issue 2-04.10.21-Management of process derived wastes.

Following the inspection, the operator provided NRW with photographic evidence showing the skips containing ash wastes had been covered.

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.