

## Compliance Assessment Report for:

# STANDALONE MEDIUM COMBUSTION PLANT AND SPECIFIED GENERATORS

<b>Permit number</b>	PAN005141	<b>Operator name</b>	Newbridge Energy Ltd
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<b>Site name</b>	Newbridge Energy Ltd
<b>Site address</b>	Brickfield Lane, Denbigh Road, Ruthin, Denbighshire, LL15 2TN
<b>Type of assessment</b>	Site inspection

<b>Date of assessment</b>	04/08/23	<b>Time in</b>	14:46	<b>Time out</b>	15:32
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<b>Parts of permit assessed</b>	Site inspection
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<b>NRW Lead officer</b>	Jamie Blythin	<b>Accompanied by</b>	N/A
<b>Report sent to – Name and position</b>	Richard Errington (Director)	<b>Date</b>	11/09/23

## 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	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
1

## 2. What action is required?

Criteria	Action needed	Complete by
B4	Extend the length of the roof coverings on the fuel storage bays to ensure all CHP fuel is stored undercover. Provide NRW with photographic evidence that this has been completed.	03/11/23

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 an unannounced site inspection at Newbridge Energy Ltd which was completed in response to reports of odour and smoke.

Immediately before attending site, NRW staff carried out offsite observations in the vicinity of the Glasdir housing estate and the nearby Aldi car park. Emissions from The Combined Heat and Power (CHP) unit stack (NB2) fluctuated between being barely visible to slightly hazy. There was a slight wood odour which was localised and transient. These observations were consistent with the start-up of the CHP units detailed below.

On arriving at site, NRW staff were met by the Health, Safety and Environmental Compliance (HSEC) Manager who explained that both permitted CHP units (NB1 and NB2) had been non-operational for approximately 3 weeks while routine maintenance was completed. CHP unit NB2 commenced the start-up procedure on 03/08/23 at approximately 18:00hrs and was nearing the optimum operating temperature at the time of the inspection. Staff were preparing to begin the start-up procedure for the second CHP unit (NB1).

Fuel from NB2 was sampled for moisture content during the inspection and it recorded a value within the manufacturer's specification. Records were available which demonstrated that adequate sampling/ monitoring was being undertaken to ensure the moisture content of the fuel was within the manufacturer's specification.

There were no odours observed on site and emissions from NB2 were barely visible at the time of the inspection.

The quantity of CHP fuel stored on site exceeded the storage capacity of the covered fuel storage bays. The majority of fuel was contained undercover but there was some fuel stored in front of the bays which does not benefit from the roof coverings.

The permit requires that CHP fuel is stored undercover and the operator received a non-compliance score for this issue on the last site inspection (03/05/23). To resolve this issue, the operator stated that they would control fuel quantities by managing deliveries, updating the Environmental Management System (EMS) and Site Operating Procedures (SOPs).

SOP-Fuel Blending and Application (006) was updated in July 2023 to include the following

'5. After unloading, all fuel material must be moved into the covered bays, to ensure control of exposure to moisture, so that all fuel is undercover.'

At the time of the inspection, aspects of SOP Fuel Blending and application (006) were not followed which resulted in fuel being stored outside of the covered bays. NRW considers this a breach of permit condition 1.1.1 (B4-Infrastructure-Containment of stored materials-CCS3).

This issue was discussed with the HSEC Manager and it became clear that to accommodate the fuel quantities required and ensure all fuel remained undercover, the most pragmatic solution was to extend the length of the roof coverings on the fuel storage bays.

Action1- Extend the length of the roof coverings on the fuel storage bays to ensure all CHP fuel is stored undercover. Provide NRW with photographic evidence that this has been completed. Due 03/11/23.

Following the site inspection, the HSEC Manager confirmed that they will extend the length of the roof coverings on the fuel bays and there is an approximate lead time of 8 weeks for this work to be completed. If this timeframe should change, please contact NRW to agree a new compliance deadline.

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](mailto: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](mailto: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.