

Compliance Assessment Report

Report ID:
CAR_NRW0035288

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

Site	Magor Brewery EPR/BX7282IS	Permit Ref	BX7282IS		
Operator/Permit holder	AB InBev UK Ltd				
Regime	Installations				
Date of assessment	07/06/2019	Time in	10:00	Out	15:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Annual returns, pre app discussions				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Carl Rogers/ Environment and Safety Manager	Date issued	24/06/2019		

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
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	2.2.1.3

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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

ABInBev – site visit 7th June 2018

Actions carried forward from CAR Form issued on 31st May 2018

ACTION: AB InBev to provide more information on the carbon monoxide reading for the December 2017 monitoring round for release point A1. The submitted reading was >5770mg/m3.

Carried forward. The site has experienced similar results during the last two rounds of monitoring.

ACTION: Please update the form MR1 to ensure consistency with the annual report. **Completed.**

ACTION: AB InBev to provide the updated AMP as required by permit condition 2.8.1 due in 2018. **Completed.**

ACTION: Please could ABInBev confirm that the cereal dust is disposed or undergoes some sort of recovery treatment. The EMS states zero waste to landfill indicating that there is no final disposal of any waste streams. Carried forward. AB InBev explained that the reason that malt dust was disposed of as deep trench burial is predominantly due to personnel safety and handling of the dust. The zero waste to landfill is applied to all dry waste streams (not malt dust which used to be separate). **Completed.**

ACTION: The cereal dust states that the spent malt dust is disposed of via a deep trench burial. Are there any options to recover this material? **Carried forward.** ABInbev to review options for recovery.

ACTION: The report states that the 500kg of R410a was added to just one refrigeration unit, could AB InBev please provide more details on any issues with this unit and what steps have been taken to ensure there are no such leaks in 2018? **Carried forward.**

ACTION: Please could AB InBev provide some feedback on this trial. **Carried forward.**

ACTION: AB InBev to provide an update on the project to ensure that there is no impact from odour generation at nearby receptors. The odour management plan should be used during any trials and updated accordingly. **Completed.**

Pre application meeting on 7th June 2019

The meeting between NRW, ABInBev and their consultants identified the following to be included in the permit variation:

- Include Flue-Ace system
- Temporary warehouses
- Addition of 24 storage vessels
- Addition of 4 storage silos
- Addition of release points for 2 new cooling towers
- Addition of discharge point from trailer park
- Addition of TOC meter at discharge point W1
- Removal of 2 x CHP and 1.1 Activity
- ETP changes (not to be completed until 2020)
- New ETP CHP (not to be completed until 2020)
- Add/ check ETP flare is added as emission point
- Addition of bottling line 4 as a new 6.8 listed activity

At the meeting the thermal input was discussed. Recent work undertaken calculated that the thermal input was below the 50MWth input threshold for a 1.1 combustion activity. If the site does not exceed the 50MWth threshold it would likely to fall as a 1.1 Part B activity.

ACTION: AB InBev to recalculate the thermal input at the site taking into consideration all combustion activities on site (including the effluent treatment plant) and incorporate its findings with the permit variation.

2018 Annual returns

The following returns have been received with associated comments:

W1

2018 - Q1, Q2, Q3 and Q4

2019 – Q1

A1

2018 – January to June and July to December

For both monitoring rounds the CO concentrations were high with previous monitoring rounds in 2017, and earlier rounds, much lower.

ACTION: Please could AB InBev investigate these increased CO levels.

A5 and A6 remain not in operation with the intention to remove the CHP engines.

A2

2018 – Q1, Q2, Q3 and Q4.

The Q4 submission showed an exceedance of the NO2 limit value of 500mg/m3.

Considered a category 3 breach of permit condition 2.2.1.3.

GAS1

2018 – January to June and July to December

E2, R1, WU1, E1, PI1 and MR1 - 2018

There is a possible duplication of the electricity generation in Form E2.

ACTION: AB InBev to check that the data inputted is correct.

Fugitive emissions plan annual review

The revised fugitive emissions plan has been received with no significant changes to the plan. There have been no complaints or incidents regarding fugitive emissions in 2018.

2018 EMS annual submission

The EMS structure remains unchanged with the key environmental initiatives for 2018/19 being:

- Restoration of the integrity of storm water and waste water drains remains the key priority for 2019.
- BTS control and optimisation.
- Bund integrity and compliance.
- Automate our warehouse facility to reduce carbon emission from forklift usage.
- Project Yellowstone- an energy saving initiative in the Brewhouse, reducing electrical use and energy intensity in the brewing process.
- Replaced the hot water tank that was in poor condition.
- CV tank replacement. Improvement in energy efficiency.
- Site drainage survey is underway
- External Site Environmental Impact assessment is being undertaken.

SPMP / SCR review

The SCR is in the process of being revised and will be submitted as part of the permit variation due in 2019.

Accident management plan

The AMP sets out limits for the control of storm water discharges that would be incorporated into the SOP ES013 for Storm Water Discharge. The proposed limits for pH is 6.5 – 8.0 with COD <100mg/l or TOC <30mg/l. These limits are not prescribed in the permit itself with the Operator proposing to apply for these to be incorporated into the permit. The site has undertaken substantial work on the integrity of the internal drainage at the site to prevent any misconnections. The ability to divert surface water via Waundeilad Reen

will reduce the amount of water sent to the offsite ETP.

ACTION: The AMP requires minor updates, for example version control, page numbering and reference to previous staff. Please could this be update in the next revision.

Resource efficiency plan

A review has been undertaken using the resource efficiency audit questionnaire with suitable justification provided for the scores allocated and how the criterion is met. AB InBev have extensive KPIs that are trended with associated targets.

The site is looking to connect to a local wind turbine for their electricity generation as well as utilising solar panels for electricity generation. This will enable the site to reduce their carbon footprint. The site will still require gas for generation for the brewing process.

Notifications

There have been three notifications received in 2018.

1. 15th July 2018 – Short term noise from the site at approximately 22:00. Follow up investigation identified a blockage in the pipework of boiler 1. The boiler was subsequently drained to remove the blockage with the annual planned maintenance revised to include routine clearing of any build-up with 2 hourly checks put in place.
2. 28th September 2018 – Notification receive for raised pH of 9.08. The probe was removed, cleaned and recalibrated with the pump pit cleaned also to prevent the potential for false readings. The frequency of the pump pit inspections has been increased.
3. 28th September 2018 – Notification received for a delay in the reading of emissions from the CHP engine due to maintenance problems. Monitoring planned for when the engine is back in operation.

End.

EPR Compliance Assessment Report

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Operator/Permit holder	AB InBev UK Ltd	Date	07/06/2019

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			
G1	C3	Trend future monitoring levels	31/12/2019

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.