

	EPR Compliance Assessment Report	Report ID: 102992/0224579			
This form will report compliance with your permit as determined by an NRW officer					
Site	Great Porthamel Biotech A D Plant		Permit Ref	102992	
Operator/ Permit holder	G P Biotech Ltd				
Date	06/11/2014	Time in	13:00	Out	17:00
What parts of the permit were assessed	OMP / EMS				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Lucy Warry				
Officer's name	David A Willey, Geriant Richards, Emma Jones		Date issued	20/11/2014	

Section 1 - Compliance Assessment Summary					
This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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					Condition(s) breached
a) Permitted activities	1. Specified by permit	N			
b) Infrastructure	1. Engineering for prevention & control of pollution	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	N			
	4. Containment of stored materials	N			
	5. Plant and equipment	A			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	A			
	3. Materials acceptance	A			
	4. Storage handling, labelling, segregation	A			
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	A			
e) Emissions	1. Air	N			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	A			
	2. Noise	N			
	3. Dust/fibres/particulates	N			
	4. Pests, birds & scavengers	N			
	5. Deposits on road	N			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N			
	2. Records of activity, site diary, journal & events	N			
	3. Maintenance records	N			
	4. Reporting & notification	N			
h) Resource efficiency	1. Efficient use of raw materials	N			
	2. Energy	N			
KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Site: Great Porthamel AD Plant (GP Biotec Ltd)

Date: 6th November 2014

Time: 13:00

Scope

1. Overview of process
2. Odour management plan
3. Environmental Management System
4. Community Liaison Group
5. Permitting update – IED requirements and BAT
6. OPRA and charging
7. Site tour / inspection

1. Overview of process

This was the first meeting with GP Biotec Ltd following the handover from the EM team. The AD plant is due to be regulated as an installation due its capacity exceeding the new thresholds brought about by the Industrial Emissions Directive. GP Biotec have submitted their application to Natural Resources Wales and it has been Duly Made.

David Willey, Geriant Richards and Emma Jones (NRW) met with Paul Jones, Gary Jones and Lucy Warry (GP Biotec Ltd) to discuss the additional requirements for their permit application as well as the submitted Odour Management Plan that is pending approval by NRW.

Paul and Gary provided an update on how the site is operating and recent changes made at the farm. These include:

- A separator installed to aid the separation of solids from the liquid fraction of the slurry
- Installation of a carbon filter to treat the air from the storage tanks and waste reception area
- Area has been made impermeable with the installation of suitable membrane
- The installation of a weather station

The site has also been involved in a number of exercise in conjunction with the local fire service.

This will help aid the accident management plan.

Lessons have been learnt over the summer and steps taken by the Operator to ensure these issues will not arise again.

Future changes were also discussed, these include:

- An additional carbon filter to act as a backup to the current filter
- A refrigeration system to help keep the blood storage tank cool during the summer months
- A second CHP engine to be installed that has the additional benefits of maintaining the parasitic load
- Housing for the storage tanks to be benefitted from the extraction to the carbon filter. This will encompass the new storage tanks to be installed in the future
- The site is currently undergoing the third test to establish whether the compost achieves the PAS 110 quality protocol
- A website being put together for the site

Action: GP Biotec to provide NRW with the waste codes classified as hazardous and non-hazardous in respect to waste received from the abattoir. This is important due to the restrictions in place for the quantity received each day of hazardous waste.

The Operator has begun to look at historic waste data in response to an earlier action from NRW. **It was agreed in the meeting that the Operator only need go back to October 2013 as before this data the only waste received was maize.**

The Operator noted that the permit states that the emission limits are expressed at 3% instead of 5% as stated in the EA/NRW guidance. This will be amended in the next variation of the permit. **NRW confirm that the Operator is to report at 5% instead of 3% as stated in the permit in the interim.**

2. Odour management plan

The Operator has submitted an Odour Management Plan (OMP) for approval by NRW. NRW are in the process of reviewing the document and will have a response shortly. The OMP will then remain a 'live' document that can be updated / amended with a mechanism for version control. The Operator also confirmed that they will only be undertaking injection to ground in the area surrounding Talgarth to reduce the potential impact of odour.

3. Environmental Management System

The EMS submitted to NRW was discussed with NRW commenting that this will need to be revised to be in line with the requirements of IED and the permit application. Interaction with NRW is encouraged to ensure that the EMS meets the relevant requirements. Additional requirements of the EMS will be the inclusion of an Accident Management Plan to highlight what backup systems are in place as well as those listed in *How to comply with your environmental permit*.

ACTION: The EMS had reference to some '99' codes that are not permitted. The EMS should be amended to reflect this.

The EMS should also reflect that land spreading is in accordance with The Code of Good

Agricultural Practice along with relevant Welsh Assembly Cross Compliance standards regarding weather conditions, Soil management including soil erosion and dealing with compaction, use of buffer strips and watercourses.

Mechanisms should be in place to monitor phosphate levels to ensure good Nutrient Management.

4. Community Liaison Group

The use and the importance of a community liaison group was discussed. NRW mentioned that this group could be used to settle concerns, for example, requesting a member of the Health Protection Agency to talk through the health implications of the odour generated. The Operator is currently looking to agree attendees to this meeting.

5. Permitting update – IED requirements and BAT

To ensure the AD plant will be compliant with the permit under IED NRW propose a gap analysis to be undertaken. **NRW will confirm the best available techniques to be used in the assessment.**

6. OPRA and charging

NRW discussed the additional requirements of the OPRA charging scheme and agreed to review the OPRA profile to ensure all aspects are correct.

7. Site tour / inspection

A site tour was conducted by Paul and Gary Jones to help David and Emma become familiar with the site. The site is undergoing the final stages of being developed but the main infrastructures are in place.

ACTION: Please could the Operator provide timescales (approximate) for the remaining works at the site?

ACTION: The Silage Clamp does not comply with the Water Resources (Control of Pollution) Silage, Slurry and Agricultural fuel Oil (Wales) Regulations 2010. Please could you provide a timescale for bringing the Silage Clamp into compliance?

The area where the CHP engine is housed is currently being developed to incorporate an office. Paul and Gary were able to demonstrate the controls in place for the CHP engine that uses their mobile phones to indicate any problems.

During the tour no odour was detected next to the storage tanks or by the carbon filter.

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Operator/ Permit	G P Biotec Ltd	Date 06/11/2014

Section 3- Enforcement Response	Only one of the boxes below should be ticked
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.	☐
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	☐
We will now consider what enforcement action is appropriate and notify you, referencing this form.	☐

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.