

	EPR Compliance Assessment Report	Report ID: 102992/0234183			
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	24/02/2015		Time in	14:00	Out 17:00
What parts of the permit were assessed	Monitoring requirements, odour, reporting				
Assessment	Check monitoring/sampling	EPR Activity:	Installation	Waste Op X	Water Discharge
Recipient's name/position	Paul Jones, Lucy Warry				
Officer's name	David A Willey, Emma Jones,		Date issued	03/03/2015	

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	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
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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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: 24th February 2015

Time: 14:00

Scope

1. Site update
2. Odour
3. Waste data to site ratios in line with planning
4. Reporting requirements
5. Permitting update – IED requirements Gap analysis / BAT assessment
6. PAS 110 update
7. Community Liaison Group feedback Site tour / inspection

1. Site update

GP Biotec reported that the existing engine has been performing very well running for 8500 hours in 2014, this equates to 97% availability.

2. Odour

There have been three complaints received since the last CAR Form was issued. For each of the complaints received GP Biotec have followed their Odour Management Plan to ensure there is no odour associated with their process. GP Biotec have provided NRW a summary of their investigations as well as wind data collected from their onsite weather station. For each complaint NRW have been unable to substantiate the complaint and have spoken to the members of public to establish the source of odour experienced.

GP Biotec have submitted the latest version of their Odour Management Plan that is with NRW pending approval. GP Biotec has also confirmed the timelines for the installation of odour mitigating equipment as well as other projects on site.

Refrigeration unit – April 2015

New blood tank – May 2015

New engine – base infrastructure currently being installed for new engine. To be installed

towards the end of March 2015.
Housing for storage tanks – May 2015
Onsite infrastructure – has begun
Education centre – June 2015
Silage clamp – September 2015

3. Waste data

GP Biotec supplied a copy of the waste received to site since October 2013.

ACTION: GP Biotec to supply an electronic version of the waste spreadsheet to NRW.

4. Reporting requirements

This CAR Form changes the reporting date in the permit for emission to air from March to June. The next round of monitoring should be undertaken in June 2015. The previous monitoring for the engine was undertaken on the 30th May 2014 and submitted on 16th June 2014 at 5% Oxygen with no exceedences of the associated ELVs.

ACTION: With regards to the monitoring results in the last report dated 16th June 2014 the results have a high % uncertainty. Please can you ensure that during the next round of monitoring the results are reported within the acceptable levels as referred to in Table 7.1 (page 76) of M2 Monitoring of stack emission to air.

ACTION: NRW to send details of calculating emission concentrations recorded from monitored data that consider uncertainty in the monitoring results.

ACTION: GP Biotec to send quarterly waste returns to the sites NRW Regulatory Officer as well as to the enquiries e-mail address.

ACTION: GP Biotec to submit H₂S monitoring data before and after combustion / abatement as well as biogas flow to the engines. This data will be used as a performance indicator for the site. Frequency to be proposed by GP Biotec and agreed with NRW.

5. Permitting update

The application from GP Biotec is with the NRW permitting team. The application is to bring the site in line with the requirements of the Industrial Emissions Directive. As part of the permitting process the site is required to demonstrate their compliance with the Best Available Techniques for their process.

ACTION: NRW to undertake a GAP analysis in line with BAT relevant to the Great Porthamel AD Plant assessment.

6. PAS 110 update

GP Biotec are awaiting confirmation of their status for the digestate produced on the site meeting the PAS 110 criteria. Confirmation should be received in the week commencing the 9th March 2015.

7. Community Liaison Group feedback

The meeting held on the 28th January at Talgarth Town Hall was attended by the nominated attendees and chaired by the Mayor of Talgarth. GP Biotec received praise for their approach and for listening to the concerns of the Talgarth public. GP Biotec have also offered two dates to accommodate members of the group on a tour of the site. The next meeting is to be held on the

25th March 2015.

8. Site tour / inspection

A site tour was conducted by Paul Jones and Lucy Warry. Infrastructure was being installed for the new gas engine as well as completion of the entrance area to the top area of the site. An area has been designated for the new education centre that is proposed and due to begin construction in June 2015.

NRW asked about the temporary bunding and the associated timescales to get permanent bunding in place, this will follow the installation of the final two digesters at the site.

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

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Operator/ Permit	G P Biotec Ltd	Date	24/02/2015

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.