

Compliance Assessment Report

Report ID:
CAR_NRW0032305

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

Site	GP Biotec Ltd	Permit Ref	AB3233DW		
Operator/Permit holder	GP Biotec Ltd				
Regime	Installations				
Date of assessment	13/07/2017	Time in	10:00	Out	17:00
Assessment type	Audit				
Parts of the permit assessed	PC 3.2.3 Containment				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Lucy Wary/ Environmental Systems Manager	Date issued	16/10/2017		

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
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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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Actions from last Car Form dated 13th September 2016.

ACTION: GP Biotec to update the Offsite Incident Response Plan and associated OMP. **Completed.**

ACTION: GP Biotec to inform NRW when the tanks are ready for storage and provide details of the associated tank design/specifications and bunding. **Completed – has been considered as part of the containment audit.**

ACTION: GP Biotec to provide details of the blood being fed to the process to demonstrate throughput. In addition GP Biotec to provide details of how the site undertakes checks for capacity of the storage tank to ensure there is no over filling or unnecessary delays in off-loading the blood to the storage tank. **Completed - Tank levels are checked daily as part of the 'GP Biotec Daily Checks proforma' and the 'GP Biotec Weekly Checklist Record'.**

ACTION: NRW to investigate and confirm the requirement of weighing waste by the producer as it leaves its source and subsequent weighing at GP Biotec to ensure all transfer notes are comparable. **Completed - All sites that generate waste need to comprehensively characterise and quantify each waste stream arising from the regulated facility**

Actions carried forward

ACTION: GP Biotec to inform NRW via e-mail of these daily exceedances and review the sites logistics regarding blood collections annually.

ACTION: NRW to provide guidance and associated BAT for other media type used in the filters.

Recommendations following waste audit

Recommendations:

1. GP Biotec to consider the use of an automated system to log the receiving waste at the weigh bridge to avoid the potential for human error and to ensure all waste accepted is recorded. This will help eliminate error in any waste returns as well as making the process more efficient for GP Biotec. There is a large amount of data recorded to date with the amount to increase in the future. A bespoke system to log and track this data will provide GP Biotec with a robust system for interrogating data. **Completed**

2. GP Biotec to update the sites standard operating procedure for the annual sampling undertaken as part of the sampling plan for each of the suppliers. **Completed**
3. GP Biotec to put in place a procedure for when “separation” scenarios of the bulk load occur and add them to the sites EMS. (Separation being where the load within the container separates and therefore not giving a representative sample. This might not be applicable to GP Biotec but NRW require justification to the BAT requirement.) **Completed**
4. GP Biotec to consider the way waste data is recorded. A more efficient system that would automatically record waste data from the weighbridge, incorporate level indicators from the tanks and factor in all relevant parameters is encouraged. **Completed**
5. GP Biotec to explore the options of having an offsite backup of their electronic data. **Completed**
6. GP Biotec to confirm and justify the time periods that samples are retained for. **Completed**
7. GP Biotec to consider different methods of undertaking daily checks that could be undertaken electronically. **Completed**

Containment audit on 13th July 2017

As part of Natural Resources Wales’ ongoing compliance work NRW will be undertaking an audit of the tanks and storage lagoons, as well as the associated containment in place, at the site regulated by Natural Resources Wales.

The audit will be undertaken in line with the permit condition 3.2.3 for releases from liquids in containers where it states:

All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or, where that is not practicable, to minimise, leakage and spillage from the primary container.

The objective is to ensure sites are compliant with the permit condition and that any risks are identified and avoid the potential for an environmental incident.

The audit itself will identify each tank / lagoon and have a series of questions that will be used to determine whether any further actions are required to bring them back into compliance.

The following checklist was used during the audit.

Parameter	Requirement
Environmental Management System	<i>Is there a section of the EMS that addresses containment?</i>
Maintenance / inspections procedures	<i>Where are maintenance / inspection procedures kept within the EMS?</i>
Accident management plan	<i>Is there an up to date accident management plan in place?</i>
Planned Preventative Maintenance	<i>Is there one in place?</i>
Location of tank / IBCs / drums / lagoons	Site map showing location
Safety Data Sheet	<i>What does the tank hold?</i>
Tank / lagoon Specification	Relevant BSI standard or SSAFO
Ancillary equipment	<i>identify ancillary equipment specifications.</i>
Secondary containment present	Yes / No
Secondary containment specification	<i>Suitability of secondary containment.</i>

Level of risk to environment	Use source / pathway / receptor approach for each source with the following criteria. Consider flood, security here too. <i>H – high rating</i> <i>M – moderate rating</i> <i>L – low rating</i> <table border="1"> <thead> <tr> <th></th> <th>Associated risk</th> <th>Rating</th> </tr> </thead> <tbody> <tr> <td>Source hazard</td> <td></td> <td></td> </tr> <tr> <td>Pathway</td> <td></td> <td></td> </tr> <tr> <td>Receptor hazard</td> <td></td> <td></td> </tr> </tbody> </table> With overall rating assessed against: High – HHH, HHM, HMM (high potential for CICs category 1 incident) Medium – HHL, MMM, HML (medium potential for CICs category 2 incident) Low – MML, HLL, MLL, LLL (low potential for CICs category 3 incident)		Associated risk	Rating	Source hazard			Pathway			Receptor hazard		
	Associated risk	Rating											
Source hazard													
Pathway													
Receptor hazard													
Photos – primary and secondary Initial assessment, is further action required?													

To complete the audit photos of the following storage locations are required. The audit report will be completed on receipt of the following information.

Tank ID: To be assessed	
Require photos of primary and secondary bunding as well as the risk assessment	
Lagoon	Cwrt Y Plyffin, Trefei – 600m ³
Lagoon	Pencaemellyn Farm, Nr Talachddu - 1800m ³
Tank	Pengenfford - 800m ³
Lagoon	Llangorse - 300m ³
Lagoon	Sheepcote, Herefordshire - 3000m ³
TBC	Parks Farm, Sarnesfield, Leominster - 500m ³
Lagoon	Gwernybwtler - 100m ³
Lagoon	Plas Farm, Llangorse - 500m ³
Tank	Red diesel tank – capacity?
Tank	White diesel tank – capacity?

2016 returns

Air 1 - No comments.

2016 Annual report. The following comments have been made.

The site is proposing to install the following in 2017:

- An additional digester.
- Three new carbon filters.
- New solid feeding system.

PAS110 continues to be met by the site allowing the digestate to be treated as a non-waste.

H₂S levels had raised levels on two occasions with swift actions taken by the site to identify and remedy the issue.

The report states that the FOS/TAC ratio showed an increase in November 2016 with the possibility that one of the mixers is not working as effectively as it should.

ACTION: Please could the site update NRW on the FOS/TAC ratio now that there has been a period of recirculation.

ACTION: Please could GP Biotec advise their contingency measures for when there is a major fault with a digester and it requires maintenance inside?

Section 12 of the annual report refers to Spreading Activities and records. Further work and re-assurance is required to satisfy concerns of there not being enough land for spreading the digestate and concerns over storage capacity. NRW will continue to work with GP Biotec to ensure this is the case as well as looking at the waste input volumes.

NRW have also received the APHA approved Hazard Analysis and Critical Control Points Plan.

Permit variation

Previous correspondence with GP Biotec indicated the possibility of receiving waste material from Randall Foods. At the moment, the permit does not have the relevant waste codes to accept this waste. If GP Biotec wish to accept these wastes they will be required to vary their permit.

End

EPR Compliance Assessment Report

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Operator/Permit holder	GP Biotec Ltd	Date	13/07/2017

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.

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			

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.