

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	13/09/2016	Time in	10:00	Out	16:00
Assessment type	Audit				
Parts of the permit assessed	Conditons 2.3.1 and 2.3.2				
Lead officer's name	Willey, David				
Accompanied by	Jowett, John				
Recipient's name/position	Lucy Wary/ Environmental Systems Manager	Date issued	18/10/2016		

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
<p>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.</p>		

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

GP Biotec Limited meeting

This is the first CAR Form since the meeting on the 20th October 2015. Since then there have been two meetings, one on the 12th May 2016 with Ashley Lansdown (team leader of the Usk and wye Industry and Waste team) and the other on the 13th September 2016 when an audit was undertaken with John Jowett from NRW.

There have also been three liaison group meetings on 27th January, 18th May and the 28th September 2016.

Site update / previous actions

The following actions from the last CAR Form dated 20th October 2015 have been completed:

ACTION: GP Biotec to submit versions of the AMP and the OMP to NRW that are suitable to be placed on the public register, i.e. with employee names, phone numbers and addresses removed.

ACTION: GP Biotec to cross check the invoice data and data sent to the consultant with the weighbridge data and provide justification where required that will enable NRW to complete their waste data analysis.

ACTION: GP Biotec to raise this with the monitoring company. (In regard to uncertainty levels in the results.)

The following actions have been carried forward:

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.

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

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

There is still the intention to have an additional waste tank at the site within the bunded area where the existing blood tank and waste tank are situated. Once the new tank is installed then this area will be housed.

The new slurry store has been constructed and built to BS5502: Pt. 22, BS 5502: Pt. 50, BS 8007 and BS 8110: Pt. 1 standards and has a capacity of 5000 gallons. The tank has a design life of 50

years.

GP Biotec will also be installing a new solid feeder located by the waste reception area of the site. This will offer flexibility to the operations at the site. GP Biotec are in the process of converting the three existing tanks located near to the primary digester tank as storage of the non-ABP waste. The site is permitted for an additional two digesters, once installed the temporary bunding will be made permanent. GP also discussed the possibility of a second carbon filter to treat the air from the existing waste reception building.

ACTION: GP Biotec to inform NRW when the tanks are ready for storage and provide details of the associated tank design/specifications and bunding.

Odour

There have been six complaints received by NRW in 2016 (as of October 18th 2016). On each occasion GP Biotec were informed directly from NRW and triggered the Odour Management Plan requirement for the odour checks. On each occasion the odour was not associated with the permitted AD site and were not substantiated.

Waste audit

An audit was undertaken in line with the requirements of permit conditions 2.3.1 and 2.3.2. These conditions are set out below:

2.3 Operating techniques

2.3.1

(a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.

(b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

2.3.2 Waste shall only be accepted if:

- (a) it is of a type and quantity listed in schedule 2 table S2.1; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.

The findings of the audit can be found in the document ‘GP Biotec waste audit, Permit number EPR/AB3233DW’ dated 13th September 2016. The recommendations from the audit are listed below.

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.
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.
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.)
4. GP Biotec to look into 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.
5. GP Biotec to explore the options of having an offsite backup of their electronic data.
6. GP Biotec to confirm and justify the time periods that samples are retained for.
7. GP Biotec to consider different methods of undertaking daily checks that could be undertaken electronically.

In addition to the waste audit the historic waste returns were analysed due to there being an inconsistency between the waste returns and the records held by GP Biotec in the first couple of years the site was operational. The findings of this analysis can be found in the document '20150515 Waste data Analysis'.

Animal By Products daily limit

GP Biotec applied for a permit variation in November 2015 to increase the amount of blood accepted from 10 tonnes per day to 30 tonnes per day. The permit was subsequently issued on the 12th February 2016. The increased limit allows for flexibility at the site throughout the year. The increased amount accepted per day does not pose an environmental risk as the blood storage tank on site has capacity to accept and store up to 60 tonnes within a bunded area.

Following this GP Biotec informed NRW that there were occasions when the 30 tonne limit has been exceeded since the variation had been issued. GP Biotec explained that these exceedances have occurred under certain circumstances. Incidents of where the 30 tonnes per day limit has been exceeded are shown below:

Date	Amount (limit 30 tonnes per day)
23 August 2016	36.46
05 July 2016	38.32

12 July 2016	32.44
19 July 2016	30.58
09 June 2016	36.38
21 June 2016	32.36
23 June 2016	34.86
27 May 2016	31.12
08 April 2016	40.23
28 April 2016	36.64
15 March 2016	31.32
18 March 2016	32.88
04 February 2016	42.86
09 February 2016	34.54

GP Biotec use one driver to collect from Bodmin on a Monday, Wednesday and Friday and on a Tuesday and Thursday the driver collects from Merthyr following the previous day's kills as well as the kill on that day. On some occasions there is an additional load from Cig Calon Cymru that leads to the total amount of blood received on site exceeding the permitted level.

From the waste returns and the waste data supplied in 2016 for the period January to September the average load accepted per day is 11.9 tonnes, below the 30 tonne per day limit. Calculations based on the waste returns and input data from GP Biotec for a total of 274 days and a total amount accepted of 3262.28 tonnes.

The issue at the site is one of logistics that enables the business to operate. NRW are reluctant to increase the amount of blood accepted per day but do acknowledge the restrictions the limit has on the day to day business. These exceedances occur when there are not any deliveries (or are small deliveries) the day before or after.

The site has the capacity to store up to 60 tonnes of blood with secondary bunding in place. The risk to the environment where the 30 tonnes per day has been exceeded is no more to when the site is within the daily limit.

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.

NRW will not score for these breaches of the permit on the assumption that the annual throughput does not exceed the daily limit when calculated. The logistics at the site should be reviewed on a regular basis in a bid to avoid this situation from occurring.

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

Accreditation

GP Biotec are continuing to work towards accreditation with the Green Dragon Environmental Standard.

Planning permission

NRW queried GP Biotec the relevance of the design input figures listed in the Description of the Anaerobic Digester (AD) Project paragraph 8 of the Appeal Decision dated 13th January 2010. GP Biotec responded stating that 'Whilst the levels of feedstock and the generator size were discussed at the inquiry they are not specifically mentioned in the conditions, the description of the development in the permission nor in any of the approved plans. Therefore in principle they are outside the control of the NPA and exceeding the quantities discussed at the inquiry should not be a breach of planning control. You do of course have to bear in mind condition 5c which requires at least 50% of the feedstock to be from the farm, and 6c that you must have the necessary landbank on which to spread any additional digestate produced.'

The feedstock levels mentioned in Para 8 of the appeal decision are not specifically mentioned in the conditions and as such the 17,500 tonnes referred to is an estimate amount and not restricted by any condition.

The permit allows for 55,000 tonnes per year of waste and 30 tonnes per day animal by products waste.

Monitoring returns

The annual report was received with the following observations:

- Blood has been stored at around 16°C with no odour associated with the process
- Total generation in 2015 was 6,861,880KW.

Waste returns

The following waste returns have been submitted:

Quarter 4 2015.

Quarter 1 2016 with a re submissions this quarter submitted in October 2016.

Quarter 2 and 3 2016.

Documents received

The following document have been received by Natural Resources Wales;

- Hazard Analysis & Critical Control Points (HACCP) Assessment
- Biofertiliser certificate 2016

END



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0026488**

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	Date	13/09/2016

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.