

Compliance Assessment Report

**Report ID:
CAR_NRW0034398**

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	26/09/2018	Time in	09:00	Out	17:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Bunding / returns				
Lead officer's name	Willey, David				
Accompanied by					
Recipient's name/position	Lucy Warry/ Environmental Systems Manager	Date issued	28/12/2018		

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 carried over from previous Car Form issued on 16th May 2017.

ACTION: GP Biotec to ensure the waste acceptance procedures are reviewed and updated confirming waste is of an acceptable standard for processing. GP Biotec should ensure that paperwork for incoming waste is complete and accurately describes the material.

Recommendations following the waste audit

- GP Biotec to explore the options of having an offsite backup of their electronic data. **Carried forward.**

Incidents

NRW have received one complaint through the Incident Communications Centre in 2018. This was received on the 27th June with GP Biotec undertaking their odour checks with no faults detected on site. The report mentioned the nearby school as being impacted and this was followed up with an e-mail via the Town Council from the Headteacher at Ys Gol y Mynydd Du (Talgarth new Primary School).

On further investigation by GP Biotec identified the separator as being the source of odour. This was fixed in the short term by turning the separator off during the school hours and when the wind was blowing towards the school. Over the summer months carbon filters have been installed to treat the air from the liquid digestate.

Recent complaints have been received directly to GP Biotec or through the Town Council to GP Biotec from the school. One complaint was regarding a farmer (not GP Service) spreading the separated fibre on their fields and another complaint that seemed to identify the blood tank as a source. The carbon filter is due to be changed and has been identified as being the source of odour. As a result the carbon filter was changed on the 27th September 2018.

There was also concern over a garlic smell. This is associated with the vegetable peelings collected from Beacon Foods in Brecon. The Transport Manager has been informed and they will aim to collect and tip outside of school hours to minimise the impact at the school.

There was a further complaint received directly to GP Biotec on the 23rd November 2018 that was followed up by the Operator. After investigation by the Operator the odour release was identified as originating from the pump on the digester that had failed. This had a knock-on effect as the blood storage tank remained full. The second load of blood arrived in the afternoon and, despite the driver being informed that the blood storage tank level was to be monitored closely during unloading, overfilled the tank, which meant it overflowed into the bunded area that surrounds the tank. This led to associated odour problems.

The carbon filter and chiller are both working fine with the carbon being changed on the 1st October 2018.

Odour management plan

A revised Odour Management Plan, V2 2018.08.17, has been submitted to NRW for review / comment.

Waste returns

The following waste returns have been received by NRW for 2018 – Q2 and Q3.

Site works

The site is in the process of installing the final two digesters on site that will enable the permeant bunding to be put in place. The work requires the existing temporary bunding to be removed to enable the concrete base to be laid. There will be a short period of time when there is no liner in place in the bunded area.

The plan is to excavate a small amount of the stone away from the area around the steps on each of the original digesters, then pull up the liner and prepare the base to +/-10mm with stone and then compact it. Once this is complete the liner will be replaced. Then concrete will be poured for the tanks (under which there will be a further liner each). The gaps between the tanks will then be concreted and so the bund will be resealed.

Whilst the liner is removed there will be additional contingency measures put in place.

Increased monitoring of the digester tanks during the 4-hour period between midnight and 4am when the SCADA system is solely relied upon to alert Site Managers to any issues;

At this time of year much of the site's digestate storage capacity is empty, so it's a good time to carry out this work; this means if there was a major leak then the bund could be cleared using a vacuum tanker and stored in the available storage on site until the problem was resolved;

The drainage that goes underneath the bund has a tap which can be closed at night so that if any leakages happened during non-working hours nothing would be released to the environment;

In the event of a leak/containment failure GP Biotec would refer to the Accident Management Plan Spill Plans.

The bund minus the liner would still provide a successful bund, it would take a long time for any leaked contents from the digesters to permeate through to the soil and cause any kind of environmental damage.

The plan then is to build a 10ft wall around the digesters which will form the final bunded area for all four of the tanks.

On completion of the works any rainwater collected in the bunded area will need to be pumped to holding tanks and released to the environment through an existing pipeline.

ACTION: GP Biotec to confirm the location of the release point.

The collected water in the holding tanks will be released after any rain events to avoid adding additional impact. The tanks have the additional advantage that if there was a spill in the bunded area of diesel or oil

the tanks would capture the polluted water and enable this to be tankered off site. The holding tanks will be operated manually.

ACTION: The control of the holding tanks to be included into the sites EMS.

The digesters themselves will be constructed with additional diversion pipes from one digester to another in case of an emergency as well as being fitted with anti-foaming equipment and pressure release valves.

The concrete bund to be constructed will allow for a new material input unit for the farm derived material to be fed to the 2 new digesters. The bund will also encompass the digestate storage tanks to the south of the existing primary digester.

Whilst on site the digestate separator was inspected following odour complaints received over the summer at the newly built school to the south of the farm. The separated liquor is now covered with an associated carbon filter installed to treat the displaced air from the tank. Carbon filters have also been put in place at the liquid digestate loading area by the lagoon to treat any air vented from the tankers during loading. This practice has been replicated not just on site but at all the storage tanks that GP Services supply.

There is still an odour associated with the separated fibre. This is mainly due to the material being stored within an open-ended warehouse and the material dropping from height to the stockpile. At the time of the visit there was an odour detected onsite but restricted to the storage location only. However, there is the potential for the odour to travel in certain conditions. GP Biotec have confirmed that they are looking at methods to reduce the potential for odour generation for this part of the process.

ACTION: GP Biotec to investigate the storage and loading of the separated fibre from the site.

Off-site waste storage

GP Biotec are in the process of identifying options for the temporary waste storage off site. The location is that of the previous mobile plant permit held with NRW that is no longer effective. NRW are aware that the site is in the process of applying for a permit to cover this activity that forms part of the sites contingency measures.

END

EPR Compliance Assessment Report

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Operator/Permit holder	GP Biotec Ltd	Date	26/09/2018

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.