

Compliance Assessment Report CAR_NRW0043189

Permit being assessed: AB3233DW.

For: GP Biotech Ltd, **held by:** GP Biotech Ltd

At: Great Porthamel AD Plant, Talgarth, Brecon, Powys, LD3 0DL.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/01/2024 between 10:00 and 14:30.

Parts of permit assessed: Site Management, Operations, Emissions & Monitoring.

NRW Lead Officer: Rhydian Cox, accompanied by Erin Smyth-Evans, Jeremy Goddard.

Report sent to: Paul Jones, Director, on 13/02/2024.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Operations - The site	Action only (X)	
IR3C - Emissions and monitoring - Odour	Action only (X)	
IR1A - Management - General management	Assessed (A)	
IR2A - Operations - Permitted activities	Assessed (A)	
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3D - Emissions and monitoring - Noise and vibration	Assessed (A)	
IR3F - Emissions and monitoring - Pests	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR2B	Operator to submit a revised Permit Variation for Permit EPR-AB3233DW by 30/04/2024 and surrender Permit SR2017	30/04/2024

Criteria	Action needed	Complete by
	No.10 BB3099CG following the issuing of the variation.	
IR3C	Operator to change carbon filters on QP building vent	29/02/2024

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This Compliance Assessment Report (CAR) details the comments of Natural Resources Wales (NRW) Officers for the site inspection conducted on 12 January 2024 at Great Porthamel AD Plant, Talgarth, Brecon, Powys LD3 0DL for activities held by GP Biotec Ltd (the operator) under the environmental permit EPR-AB3233DW. There is also a Standard Rules Permit operational at the site SR2010 No.17 BB3099CG.

The visit purpose was to conduct an introductory inspection of both operational environmental permits and to handover regulatory duties to officer Rhydian COX. No non-compliance scores were recorded against the operator's permit conditions on this inspection.

Attendees

- Rhydian Cox – Senior Regulatory Officer, NRW
- Erin Smyth-Evans – Industry Regulation Team Leader, NRW
- Jeremy Goddard – Waste Regulation Team Leader, NRW
- Paul Jones – Director, GP Biotec
- Lucy Owen – Environmental Compliance Support, GP Biotec/Marches Biogas

Environmental Risks

The site has several sensitive receptors in its vicinity consisting of the Brecon Beacons National Park, the Afon Llynfi SAC and SSSI to the west of the site, which is a tributary of the River Wye. The towns of Talgarth to the South and Bronllys to the West.

Site Safety

Site visits to installations such as AD plants carry specific risks relating to exposure to potentially harmful gases. All NRW officers onsite had completed the mandatory training on the use of gas monitors and were up to date with the current risk assessments for visiting an AD Plant. Each NRW attendee were equipped with gas monitors which had been bump tested immediately prior to use on site. Staff also put on all required PPE. Officers were informed of site safety, evacuation routes and assembly points in case of an emergencies.

Site cleanliness was at a good standard at the time of inspection – there were no pests witnessed.

Inspection Commentary

At 10:00am NRW officers arrived at the site's main vehicle parking area, met with Lucy OWEN and signed in. Officers were then taken to the site office where we then met by Paul JONES. A meeting agenda was sent in advance by NRW, with requests for any items to be included in discussions. Introductions were had between attendees, which led onto general discussions before commencing the site tour around 11:00am. Weather conditions during the visit were overcast, cold and dry with good visibility and no wind.

An overview of the GP Biotec operations across the site was given. The operator described the history of the site, from a family-run beef suckler and arable farming enterprise, to the building and commissioning the existing AD plant in 2013. Discussions were had with regards to the feedstocks into the plant, which include mainly food processing wastes, such as abattoir waste, fruit waste, dairy washdown and silage. The silage is grown, fermented, and stored on the farm site, prior to use in the AD process. Discussions were also had around the future of the site and reducing pollution risk from activities such as the spreading of the digestate, by investing and implementing new technologies. Discussions were also had around the previous variation application submitted 10 February 2023, which had been returned by NRW's permitting department as 'Not Duly Made'.

AD Tanks

Officers were then led on a tour around the site by Paul JONES. Previous site inspection undertaken by NRW Officers in September 2020 (CAR_NRW0037020) highlighted the construction of two new digester tanks. The tanks had since been commissioned and were operational at the time of the site inspection. There are now four main tanks in use at the site. Three of which are Primary tanks, fed directly. Digestate remains in the primary tanks for 30 days before being fed into the secondary tank which is the largest of the four tanks. There it remains for 10 days before being pumped to the pasteuriser. Discussions were had around the bunding and the sizing of the bunding taking into consideration a catastrophic incident. Officers were informed that the volume of the bund was adequate to contain more than 110% of the total volume of the largest digester. A discussion was also had around the monitoring systems in place and the 24/7 monitoring rota undertaken by the



staff at the site.

Anaerobic digestion tanks (11:05am 12/01/2024)

Weighbridge and Gas Connection

Officers continued to the site entrance where the weighbridge is located. The weighbridge is used on each incoming haulier to log and track the volumes of waste incoming into the facility to inform the completion of waste returns and annual reporting figures. Adjacent to the weighbridge is the new gas connection facility which links the site to the national grid. Any surplus gas produced at the site is utilised to heat and power the offices and onsite



accommodations.

Gas connection to main grid (11:24am 12/01/2024)

Pre-Storage Tanks, Reception Facilities & Pasteurisers

There are five covered pre-storage tanks located onsite within the permit boundary. Officers were informed that these tanks are used to store the liquid waste received prior to being pumped into the primary digestors. Solid waste is unloaded into the building adjacent to the pasteurisers. The pasteurisers are used following primary and secondary digesting to

further improve the quality of the digestate. The digestate is maintained at a constant 71 degrees Celsius within the pasteurisers to ensure the denaturing of pathogens such as E. coli. Officers were informed that the current waste unloading facility was in need of upgrading, due to issues such as the lack of odour controls. The current reception facility is a potential odour source. No odours were identified at this location during the site inspection. There were discussions had around the construction of the new reception facility. An application for planning permission has been submitted and is currently under review by the local planning authority. At the time of writing, planning permission has not yet been granted. The new reception area was in the process of being constructed, with groundworks having been completed. Paul JONES and Lucy OWEN described the plan for the new facility which will integrate all the necessary odour abatement (such as negative pressure) whilst improving the efficiency of the operation.



Waste reception area (11:30am 12/01/2024)

Odour abatement is in use at the receiving waste tanks, above the QP building. There was a distinct odour identified at this location, emanating from a vent to the side of the tanks. Paul JONES informed officers that the carbon filter on the abatement required changing

ACTION: Operator to replace the carbon filters on the odour abatement vent.

QP Building, Separator & Yard

Officers continued to the location of the building where the Quality Protocol (QP) testing of the digestate occurs. If the digestate fails to meet the sufficient quality required by the QP, it is returned to the start of the process for further treatment. Once the sufficient quality is met, digestate is then pumped onto the separator. Once the digestate has been tested to ensure it meets the standards required by the QP it is then pumped through a separator which splits the digestate into a solid and liquid product. The solid material is then deposited from the separator into the covered building below, with the liquid portion



pumped into the adjacent lagoon.

Digestate Separator (11:56am 12/01/2024)

Lagoon, Silage Clamps & Digestate Tanks

Digestate enters the lagoon once it has been tested to ensure it meets the standards set in the QP. From the lagoon, it is then tankered to the digestate tanks located onsite, pending export or use onsite. Digestate is spread to land for agricultural benefit. Officers then continued to the digestate tanks via the two silage clamps used to ferment and store the silage prior to use as a feedstock in the AD plant. There are a total of eight digestate tanks onsite. There is currently one tank and concreted area covered by the Standard Rules Permit (SR2017 No.10 BB3099CG) for the storage of wastes to be used in land treatment prior to use. Following the site tour, officers returned to the site office to continue discussions and to conclude the site visit.



Digestate (product) tanks (12:26pm 12/01/2024)

Meeting Conclusions

Officers concluded the site tour and inspection in the meeting room, where discussions were had around applying to vary the Installations Permit and surrendering the Standard Rules Permit. As discussed during the meeting conclusion, the varying of the Installations Permit would be to include the following areas of the site within the revised permit boundary;

- The QP Building & Digestate Lagoon – Until proven QP compliance, the digestate is still considered a 'Waste'. The inclusion of the digestate lagoon ensures contingency for the storage of the digestate if it fails to meet the required standards.
- Track to the South of the site (running alongside the new solid waste reception area) – Include the track area within the revised boundary to encompass the new reception area.
- Areas of the Farmyard – In order to futureproof the site following discussions around further treatment of the digestate.
- The current SRP boundary – For contingency storage of incoming waste materials/non-QP digestate, prior to feeding into the AD plant.

Officers received confirmation from NRW's Installation Permitting department that it is possible to vary the permit to include two distinct separate areas on the same site. The boundaries can be shown on the site plan. The Operating Techniques will have to allow for this, and the operator will have to demonstrate that they have operational control i.e. 24/7 access. Permitting have also advised that it is recommended that the Variation is approved prior to surrendering the SRP. The operator can apply concurrently, and once the variation is issued, the SRP surrender can be duly made and processed.

ACTION: Operator to submit a revised Permit Variation for Permit EPR- AB3233DW by 30/04/2024 and surrender Permit SR2017 No.10 BB3099CG following the issuing of the variation.

END

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.