

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	21/05/2019	Time in	10:30	Out	14:00
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Annual returns, storage and containment				
Lead officer's name	Willey, David				
Accompanied by	Wrangham, Natalie				
Recipient's name/position	Lucy Warry/ Environmental Systems Manager	Date issued	05/06/2019		

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
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 28th December 2018.

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.

Completed: GP Biotec confirmed they have off-site backup through ReadyNet where information is stored and saved on an off-site server.

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

Completed. NRW and GP Biotec attended the location of the outfall where the surface water enters the River Llynfi. The co-ordinates for the location are 315660, 235523. The location of the release point as it leaves the permitted boundary needs to be reflected in the permit as W1.

ACTION: GP Biotec to amend the sites EMS to include a procedure for the inspection and subsequent release of the collected surface water.

ACTION: GP Biotec to include the release point in the permit.

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

Completed. With the final two digesters being installed work has begun on the permeant bunding that will be in place. Part of the works within the bunded area is a holding tank for surface water collected within the bunded area. GP Biotec proposes to discharge the collected water via W1 (to be added to the permit) after inspection of the collected water.

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

Completed. GP Biotec have taken measures to contain odour from the separator. Doors have been put in place on the separator building, as shown in photo 1, with further work to totally

enclose the building with collected air put through an additional carbon filter. There is the potential for a biofilter to be used in the long term. Photo 2 shows the carbon filter in place at present. During the site visit no odour was detected near to the doors.

Photo 1: Newly installed doors for odour containment



Photo 2: Carbon filter for the separator



Site meeting 21st May 2019

Annual report

The annual report was received with the following observations:

- The site has become part of a SMART Circle Research Consortium working with The University of South Wales AD Centre of Excellence looking to improve efficiencies and reduce their environmental impact. The three-year project is funded by Welsh Government.
- The annual report reflects the performance of the site and process monitoring undertaken ensures a stable reliable process.
- The report discussed the odour complaints from the nearby school caused by the separator. The odour management plan has been updated to include the school as well as the improvements to the buildings containment, extraction and treatment.
- The site is looking into the potential to dewater the digestate reducing the potential for spills during storage and transport.

Emission monitoring

The 2018 monitoring data has been received and are compliant with the sites ELVs for both engines. The form Air1 had the incorrect sample dates and times entered.

ACTION: GP Biotec to submit the monitoring report provided by the monitoring company with the Air1 reporting form and ensure that the correct sample dates and times are entered.

Variation discussions

Discussions were held regarding an increase in waste material to be accepted to site. The current limit is 55'000 tonnes per year with the site proposing to increase throughput to 75'000 tonnes per year. With the two new digesters being constructed there will be additional capacity at the site for waste to be processed, this will also enable the material to be processed in the digesters for longer periods enabling more gas to be extracted and utilised in the gas engines.

NRW stated that GP Biotec will need to demonstrate in their permit application the following:

- There is sufficient storage for the incoming waste
- There is sufficient storage for the resulting digestate
- There is sufficient landbank available

The OPRA score for the site is 72, this would equate to a normal variation fee of £4104. The permitting team have confirmed that for the BREF review a normal variation would be required to pay for the assessment. If any other changes were to be included then an additional fee to reflect the level of work would be required.

There are different types of variation that can be used to apply for a variation depending on the level of assessment required by the permitting team. These are described in the Environmental Permitting Charging Guidance document:

<https://cdn.naturalresources.wales/media/682401/environmental-permitting-charging-guidance-2017-18.pdf?mode=pad&rnd=13146933524000000>

The variation should also include:

- The addition of W1
- Revised drawing with the four waste tanks, the proposed ABP unloading area and the two new liquid tanks

- Updated site drainage plan

Struvite procedures

Struvite, and the implications of struvite build up, was discussed at the meeting. This has come to light as other sites in Wales have had issues with struvite blocking pipes and pumps leading to disruption to their activities as well as expensive maintenance costs.

GP Biotec are aware of the potential for struvite build up and undertake daily, weekly and monthly checks of the pipes and associated equipment to ensure they are all in working order. This ensures there is no build-up of struvite or from any other debris.

In addition to the checks process monitoring ensures that the potential for struvite formation is minimised.

Overview of permit requirements

The requirements for submission of the 4 yearly and 5 yearly submissions was discussed. Below is an overview of all the required submissions and the timeframes for submission.

1.1.1	EMS / Accident management plan	Review	Annually	Jul
1.2.1	Energy Efficiency	Report	Every 4 years	July / August 2019
1.3.1	Efficient use of raw materials	Report	Every 4 years	July / August 2019
1.4.2	Avoidance, recovery etc	Report	Every 4 years	Mar-20
3.1.3	Groundwater monitoring	Monitoring	Every 5 years	July / August 2020
3.1.3	Soil monitoring	Monitoring	Every 10 years	July / August 2025
3.4.1	Odour management plan	Review	Annually	Jun
4.1.1	Records	Retain for 6 years		
4.2.2	Performance	Report	Yearly	31st January
4.2.3	Emissions to air	A1 and A2	Annually	Jul
4.2.5	Waste returns	Returns	Quarterly	

Further details on the scope of the reports can be found from the below links:

[DEFRA/WG \(IED\) EPR Guidance on Part A installations](#)

[European Commission Guidance concerning baseline reports](#)

[Environmental Permitting Regulations Guidance for applicants H5 - site condition report guidance and templates](#)

BREF overview

The BREF review and associated requirements were discussed. GP Biotec have received their letter from NRW with a deadline in September to return their assessment.

NRW agreed to send GP Biotec a blank gap analysis template to aid their assessment and ensure that the relevant conclusions are assessed.

Site Inspection

An inspection of the recently issued Standard Rules Permit EPR/ BB3099CG was undertaken. The inspection template for new SRP was used with the following comments:

Technical guidance
The site is aware and complies with the relevant guidance for waste storage. The Operating Techniques for the installation permit requires the site to comply with the requirements of the Sector Guidance Note 5.06 for the recovery and disposal of hazardous and non-hazardous wastes as well as PPG 1.
Environmental Management System
There is an established EMS for the site with the site aiming to achieve ISO 14001 instead of the previously stated Green Dragon accreditation.
Technical competence
The Director of the site, Paul Jones, holds a WAMITAB Operator Competence Certificate for Anaerobic digestion facility including use of the resultant biogas as well as Continuing Competence Certificate.
Waste Returns
Waste returns for the site have been received and are complaint with the waste codes and associated limit.
Compliance/CCS scores
No non-compliance notes during the inspection
Compliance Assessment Report
This was the first inspection of the permitted SRP
Public Register
The site is aware of the system in place by NRW for the storage of documents.
Duty of Care
The site is fully aware of their Duty of Care
Hazardous Waste Regulations
n/a

Making changes to permit

There is no intention to amend the SRP at present.

Sector specific topics

The site has undergone audits on waste and digestate storage as well as odour investigations.

Fire Prevention and Mitigation Plan (FPMP)

Applicable to waste operations who store and treat combustible waste – see FPMP guidance on NRW website.

Waste accepted and stored on site is liquid with the resulting digestate used for spreading activities as a non-waste. Fire risk is low.

Landowner/leasing agent details

Land is owned by GP Biotec.

Photo 3: Drain and pumping equipment



Photo 3 shows the loading / unloading area with associated sealed bunding. There is a drain with an underground tank to capture spills. The tank is pumped out when full and is then fed into the AD process.

Photo 4: Storage tank and loading / unloading area



The concreted area is slopes towards the drain.

Overview of site changes / improvements

GP Biotec informed NRW that engine 1, the original engine, will be out of service for 2 weeks as it is undergoing a major service. This has been planned to begin on the 10th June and will last for 2 weeks. GP Biotec will be reducing the feed to digesters during this period to reduce the amount of biogas produced therefore reducing the need to flare the gas.

Photo 5: View of the two digesters currently in construction



Photo 6: Two new liquid waste tanks (foreground) in bunded area



Photo 7: Four waste storage tanks in the process of being commissioned



Photo 8: Construction of the new concrete bund



Waste returns

The following waste returns have been received by NRW:

- 2018 – Q4 received

The yearly total of waste input at the site was below the limit of 55,000 tonnes with the total being 49459.42 tonnes.

- 2019 – Q1 received

There were some queries on the waste input following the previous submissions. These have now

been rectified. The submitted waste returns were correct with the error being with the newly installed weighbridge. This has now been rectified.

The farm derived feed has not yet been submitted, once this has been received then the waste / feed ratio can be derived.

ACTION: GP Biotec to submit the farm derived feed input data.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035168**

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	21/05/2019

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.