

	EPR Compliance Assessment Report	Report ID: 102992/0250531			
This form will report compliance with your permit as determined by an NRW officer					
Site	Great Porthamel Biotech A D Plant		Permit Ref	102992	
Operator/ Permit holder	G P Biotech Ltd				
Date	20/10/2015	Time in	10:30	Out	14:00
What parts of the permit were assessed	Waste data analysis				
Assessment	Report/data review	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Lucy Wary, Paul Jones				
Officer's name	David A Willey		Date issued	27/10/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	C4	2.3.2;
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

GP Biotec Limited meeting - 20th October 2015

This is the first CAR Form since the meeting on the 24th February 2015. Since then there have been two meetings, one on the 8th May where the Team Leader for the Natural Resource Management team was shown around the site, and the second on the 15th July where the requirements of the new permit were discussed.

Site update / previous actions

All the previous actions have been completed by GP Biotec with the following comments. 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 education centre has been constructed with the onsite infrastructure (pavements etc.) being put in place in the New Year. The silage clamp has had the maize removed and is now compliant. A new clamp will be in place by July 2016.

GP Biotec will also be installing a new solid feeder located by the waste reception area of the site. This is in the design stage at the moment and will offer flexibility to the operations at the site. GP Biotec intend on using the three existing tanks located near to the primary digester tank as storage of the non-ABP waste. The tanks will require some work to become compliant, once this has been completed then the tanks can be used for non-ABP waste storage.

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

GP Biotec have also submitted final versions of the Accident Management Plan and the Odour Management Plan to NRW and have been approved.

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.

There were problems associated with the chiller used in the blood tank reported by GP Biotec. This was identified as being a fault with the fan. Following further investigation by GP Biotec the problem was as a result of the wiring being incorrect, this has now been rectified. The second digesters are proposed to be installed in the summer 2016, this will then enable the temporary bunding to be made permanent. GP also discussed the possibility of a second carbon filter to treat the air from the existing waste reception building.

Odour

There have been complaints received by NRW that have not been associated with the permitted site itself. The last complaint received in regard to the AD Site was on the 12th June 2015 where there was blood being unloaded into the blood tank. The tank was very full due to a slight delay in feeding caused by an issue earlier in the week. This combined with the increase in temperature led to a short term odour release. In response to the incident GP Biotec have refreshed the carbon in the odour control carbon filter. Since the incident the chiller has also been installed and is working effectively.

Other complaints have also been received with regards to spreading activities of which none have been substantiated by NRW. GP Biotec plan their spreading activities in line with the wind direction and weather conditions to avoid impact upon local residents. GP Biotec have also set up a dedicated mobile phone that can be used by members of the public to contact them if an odour is detected as a result of spreading. This phone is manned whilst GP Biotec are spreading. GP Biotec also direct inject to ground, this reduces the potential for odour release during these activities. Complaints received for spreading activities should be directed to the local authority as NRW are not the regulatory body for these activities since the digestate is no longer considered a waste and does not require a permit from NRW.

Waste data

Data analysis and weighbridge inconsistencies

NRW are in the final stages of analysing the submitted waste returns as well as the waste data used on site. Initial returns were based on invoices and completed by a consultant whilst more accurate data was recorded on site from the weighbridge. GP Biotec have been through all their transfer notes and weight tickets to ensure their data is accurate. The inconsistency appears to be with the use of a third party to submit the waste returns without clear knowledge of the sites activities. It was also noted that the consultant did not accurately submit the data to NRW with the quantities not matching where the waste originated.

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: 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.

ABP daily limit

GP Biotec is currently permitted under Section 5.4 Part A(1)(b)(i) for the recovery of non-hazardous waste with a capacity exceeding 100 tonnes per day by biological treatment. This activity restricts GP Biotec to accepting and processing 10 tonnes per day of animal by products. GP Biotec were under the impression that the permit allowed 70 tonnes per week and therefore increased their throughput during the working week and did not accept any ABP on the weekend.

This permit breach did not pose an environmental risk as the blood storage tank on site can accept and store up to 60 tonnes within a bunded area. **This has been considered as a Category 4 breach of the permit as there is no potential for environmental effect.**

As a result GP Biotec would like to increase the amount of ABP waste accepted to site. GP Biotec propose the limit to be 30 tonnes per day. The blood tank at the site has the capacity to hold 60m³ with the associated bunding capable of holding more than 110% of the largest tank and 25% of the aggregate volumes of the tank farm. The increase in waste would allow flexibility at the site especially during times when there is a large amount of blood waste generated from the slaughterhouses. In light of this NRW have agreed to allow GP Biotec to accept blood waste in line with the proposed limit once an application has been submitted for the variation. During this period NRW have the ability to cease this agreement at any point. If the permit variation is not accepted the site will revert to its current permitted level of 10 tonnes per day.

Spent carbon and waste audit

GP provided an update for the disposal / recovery options for the used carbon from the filters. Suppliers have indicated that they could recycle the spent carbon depending on the quality as part of them supplying fresh carbon.

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

GP also confirmed that they have arranged for the council to collect their commercial waste.

Site health and safety

GP Biotec are in the process of completing their health and safety requirements on site with the assistance of a third party. NRW provided a copy of their internal visitor sheet that ensures all Health and Safety requirements are adhered to when visiting site.

Odour control and spreading

As discussed in the odour section there have been odour complaints associated with spreading activities. Steps have been taken by GP Biotec to eliminate these complaints and as a result the Offsite Incident Response Plan and associated OMP needs to be updated.

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

Monitoring returns

Two monitoring returns have been received by NRW, one for 2013/14 and the other for 2014/15. Results were below the permitted levels but after receiving the monitoring report for the 2014/15 round it was noted that the monitoring company may have reported the uncertainty levels incorrectly.

ACTION: GP Biotec to raise this with the monitoring company.

There was no data following the commissioning of the second engine, the next round of monitoring is due in June

2016. This CAR Form confirms that the resulting monitoring forms can be submitted by the 31st January each year unless there is a breach of the ELVs or there is an approach to limit. The forms can then be titled for the year i.e. 01/01/15 to 31/12/15.

Community liaison group

There have now been four liaison group meetings, all of which have proved to be important in keeping the local residents up to date with developments at the site as well as listening to their concerns. A good example being the introduction of a dedicated mobile phone number for complaints in response to odour generated by spreading activities. This allows GP Biotec to make changes immediately and prevent further odour release.

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Section 3- Enforcement Response		Only one of the boxes below should be ticked	
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.			
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.			X
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C3	C4	No action specified	N/A

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.