

Compliance Assessment Report CAR_NRW0043312

Permit being assessed: CB3593CX.

For: Nantgarw Enzyme Production Facility, **held by:** Biocatalysts Ltd

At: Cefn Coed, Parc Nantgarw, Cardiff, Cardiff, CF15 7QQ.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 31/12/2023.

Parts of permit assessed: Annual review of low impact installation criteria.

NRW Lead Officer: Dale Padfield.

Report sent to: Hannah Stansfield, Environment, Health and safety Officer, on 02/02/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Information - Reporting	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?

No action required.

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

Biocatalysts Limited

EPR/CB3539CX

Permit condition 4.2.3 requires Biocatalyst Limited to conduct an annual review of the actual and anticipated operation of the installation against the low impact installation (LII) criteria, which is listed in the guidance for environmental permit application part B2 – Appendix 1.

Recent correspondence with Biocatalysts indicated that the operator had some concerns with meeting the waste LII criteria with regards to hazardous waste generation. Although it appears the criteria has been met for 2023, Biocatalyst are advised to monitor their waste generation, if it is anticipated that the limits will be no longer achievable a permit variation will be required.

The LII criteria are listed below for ease of reference.

Aqueous waste – The installation must not release more than 50 m³ per day of water from process activities conducted at the installation giving rise to effluent.

Abatement systems / releases to air – The installation must not rely on any active abatement for releases to the environment outside the installation, where failure of active pollution prevention could result in unacceptable releases to the environment. This does not include abatement systems installed solely for the protection of workers.

Groundwater regulations – There shall be no planned or fugitive emissions from the installation into the ground or soakaway.

Waste production – The installation must not give rise to more than one tonne of directive waste or 10 kg of hazardous waste per day, averaged over a year, with not more than 20 tonnes of Directive waste or 200 kg of hazardous waste being released in any one day.

Energy Consumption – The installation must not consume energy at a rate greater than 3 MW or, if the installation uses a combined heat and power installation to supply any internal process heat, 10 MW.

Accident prevention - Satisfactory containment measures must be in place to prevent fugitive emissions to surface water, sewer or land and ensure that these are adequately maintained at all times. This requirement applies to all substances present on site and in any quantity.

Noise – Only a low potential for causing offence due to noise, provide a justification that there is only low potential for offence due to noise.

Emissions of polluting substances - Justify that there will be no likelihood of a release to the environment of any particular substance from the whole installation at a rate greater than that determined as insignificant as set out in our guidance note 'How to comply' and 'H1 Environmental Assessment'.

Odour – There must be only a low potential for giving offence due to odour. There must be no offensive smell noticeable outside the installation boundary. Details must be provided of potential sources and justification that there is only low potential for offence due to odour.

Compliance history – If any of the following enforcement actions have taken place at the same installation under the same management (and where appropriate, have not been overturned on appeal), then it will not normally be considered further as a low impact installation:

Prosecution, formal caution, suspension notice or enforcement notice relating to an actual or potential environment incident.

Review of Biocatalysts Limited operations against the LII criteria.

Aqueous Waste

Aqueous Waste Generation	Average - m ³ / Day
2022	12.3
2023	22

The aqueous waste generated by the facility was calculated as an average of 22m³ per day, this is 28m³ below the threshold of the LII criteria. Although the average is still significantly within the threshold, there has been a significant increase when compared to 2022, Biocatalyst are advised to monitor their effluent generation in relation to potential production increases etc.

Abatement systems / releases to air

There are no active abatement systems required at the installation nor any releases to air as described in the guidance. The only abatement systems in place are to prevent loss of product and are not abating pollutants, their failure would not result in impact to human health or the environment. The only releases to air from the installation are combustion gases from the on-site boiler systems, the emissions from which screen out as insignificant.

Ground water regulations

No hazardous substances or non-hazardous substances are released to the ground from the installation, there were no reports of fugitive emissions from the installation in 2023. All operations at the installation are conducted on an impermeable surface, with all liquids stored with secondary containment. Condensate from the boilers is captured in containers and disposed of appropriately.

Waste production

The installation generated a total of 2.98 tonnes of hazardous waste and 45.2 tonnes of directive waste. This provides a daily average of 8.16 for hazardous waste and 123kg a day of directive waste. These are within the LII threshold criteria. Although the figure for the average hazardous waste generated per day has decreased when compared to 2022, the 2022 figure was calculated using working days opposed to the entire year, as such it would appear that there has been an increase in hazardous waste generation. As this figure is relatively close to the LII limit, Biocatalysts are advised to closely monitor their hazardous waste generation and ensure there are no foreseeable events, such as increases in production etc, that will result in the LII limit being

breached.

Energy consumption

The maximum combined incoming power to the installation is 1.7MW, this is 1.3MW below the LII threshold.

Accident prevention

Accident prevention remains unchanged from previous year. The site operates a planned preventative maintenance scheme, with procedures in place to cover various aspects of the operations conducted. An interceptor tank with isolation is in operation and is inspected twice annually. The purpose of which is to capture unintended spills and prevent their release to the environment. An emergency drain block procedure is in place and is practiced weekly. All stored items are kept within bunded areas, inspected daily, and emptied as necessary. The installation conducts emergency planning to prevent incidents as part of their ISO management system and has chemical spillage procedures in place, with staff trained in spill kit awareness and spill kit training theory. Emergency wallets are utilised on site providing all the information required during an incident.

Noise

Biocatalysts utilise a noise risk assessment, recording the location of all noisy equipment and operations. A noise assessment was conducted on the 25th, 26th and 29th of January where noise levels were recorded from multiple locations around the facility. Recorded noise levels sat between 60 and 80 dB (A-weighted). The operator noted that the primary noise heard externally was from road traffic on the A470, which is situated within 50m to the East of the installation. Noisy equipment is maintained as part of the PPM schedule, deliveries as well as the majority of workload is managed to take place within day-time hours.

Emission of polluting substances

All releases to air – boiler gas exhausts have screened out as insignificant, there are no other releases from the installation apart from the effluent discharge, with consent limits imposed by Dwr Cymru Welsh Water (DCWW). All polluting substances, such as the various liquids utilised within the process are all stored with secondary containment, with tertiary containment provided by the impermeable surfacing and interceptor tank.

Odour

The operator has stated that no odours are emitted from outside the installation during the manufacturing process or when the process is not running. There are no offence odours detectable beyond the installation boundary. There have been no odour complaints from neighbouring companies or residents to date.

Compliance history

There have been no non-compliances of permit conditions at the installation and no enforcement action has

been taken.

All LII criteria have been satisfied for 2023. All reports are accepted.

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.